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4     SELECT COMMITTEE TO INVESTIGATE THE  
5     JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6     U.S. HOUSE OF REPRESENTATIVES,  
7     WASHINGTON, D.C.

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11 DEPOSITION OF: MOLLY MICHAEL

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15              Thursday, March 24, 2022

16  
17 Washington, D.C.  
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19  
20 The deposition in the above matter was held via Webex, commencing at 10:08  
21 a.m.  
22 Present: Representative Murphy.

1        Appearances:

2

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5        For the SELECT COMMITTEE TO INVESTIGATE

6        THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

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9        [REDACTED] INVESTIGATIVE COUNSEL

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17      [REDACTED], INVESTIGATIVE COUNSEL

18      [REDACTED] PROFESSIONAL STAFF MEMBER

19      [REDACTED] OF COUNSEL TO THE VICE CHAIR

20

21      For THE WITNESS:

22

23      DANIEL BENSON

24      JONATHAN GONZALES

25      Kasowitz Benson Torres LLP

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2      Suite 201  
3      Washington, D.C.    20005

1

2 [REDACTED] Good morning. This is a deposition of Molly Michael conducted by  
3 the House Select Committee to Investigate the January 6th Attack on the United States  
4 Capitol, pursuant to House Resolution 503.

5 At this time, I'd like to ask the witness to please state your full name and spell  
6 your last name for the record.

7 The Witness. My name is Molly Amelia Michael; last name M-i-c-h-a-e-l.

8 [REDACTED] Thank you.

9 And, counsel, could you please state your full name and spell your last name for  
10 the record as well?

11 Mr. Benson. Daniel Benson, B-e-n-s-o-n, from the Kasowitz Benson Torres law  
12 firm.

13 [REDACTED] Thank you. And, Mr. Benson, are you accompanied by anyone else  
14 from your law firm today?

15 Mr. Benson. Yes. Jonathan Gonzales, litigation specialist at our firm, is on  
16 the -- also on the call.

17 [REDACTED] Okay. Thank you.

18 So this will be a staff-led deposition today. If any members join, they will be  
19 shown on the right-hand side of your screen in the Webex view. I believe  
20 Representative Murphy is joining us now.

21 And, if other members join throughout the day today, I'll do my best to draw your  
22 attention to that just to note for the record when they join. They will have other  
23 obligations during the day, so I probably won't note when they leave.

24 We will take pauses throughout the day so that members may ask their own  
25 questions if they have any.

1           Again, my name is [REDACTED] I'm an investigative counsel for the select  
2 committee, and I'll be starting off the day primarily answering questions. And then my  
3 colleague, [REDACTED] also investigative counsel for the committee, will ask  
4 some questions this afternoon as well.

5           I am joined here in the room by other staff for the select committee. Here to my  
6 left in the room is [REDACTED], our chief investigative counsel. At end of the table is  
7 [REDACTED] senior investigative counsel and of counsel to the vice chair.

8           In addition to [REDACTED], we have [REDACTED], a professional staff  
9 member for the committee.

10          We may have some other staff for the committee join us through Webex today.  
11 Right now, I note that our chief clerk, [REDACTED], is on the line as well.

12          So a few kind of preliminaries to go over for you, Ms. Michael, before we begin.

13          Under the House deposition rules, neither committee members nor staff may  
14 discuss the substance of the testimony that you're providing today unless the committee  
15 approves its release. You and your attorney will have the opportunity to review the  
16 transcript if you wish to do so.

17          I just want to go over a few ground rules.

18          We will follow the House deposition rules that we've provided to you with your  
19 subpoena and through your counsel previously. Under these House deposition rules,  
20 counsel for other persons or government agencies may not attend, though you are, of  
21 course, permitted to have your attorney present with you.

22          There are official reporters transcribing the record of the deposition. They're  
23 here with us over Webex. You can see that there is a number of them. They will trade  
24 off responsibility, but the transcript that the reporters make will be the official record of  
25 this deposition.

1           And, because they're transcribing it, as I mentioned, Mr. Benson, we'll need to see  
2       you on screen if you're going to be speaking during the deposition.

3           And, Ms. Michael, we will ask that you please wait for each question to be  
4       completed before giving your response, and we also will try to do the same thing on our  
5       end so that we don't ask any -- our next question until you've completed your responses.

6           The official reporters also cannot record nonverbal responses, such as shaking or  
7       nodding your head, so, please, it's important that you answer each question with a verbal  
8       response.

9           Today, we ask that you provide complete answers based on your best recollection.  
10       If our questions are not clear -- and I fully anticipate that there will be some that need  
11       clarification, so please don't hesitate to ask us to clarify, and we'd be happy so do so. If  
12       you don't know the answer to any of our questions, please say so.

13       And you may only refuse to answer a question today to preserve a privilege that is  
14       recognized by the select committee. So, if you refuse to answer a question based on a  
15       privilege, we, the staff, may either proceed with the deposition, or seek a ruling from the  
16       chair on any objections. If the chair were to overrule such an objection, you're required  
17       to answer the question.

18       I also want to remind you that it is unlawful to deliberately provide false  
19       information to Congress. And, since this deposition will be under oath, providing false  
20       information could result in criminal penalties for perjury and/or for providing false  
21       statements.

22       Ms. Michael, do you understand that?

23       The Witness. Yes, I understand.

24       [REDACTED] Okay. Thank you.

25       At this time, could you please raise your right hand. And I'll ask the official

1 reporters to swear you in.

2           The Reporter. Do you solemnly declare and affirm under the penalties of perjury  
3       that the testimony you are about to give will be the truth, the whole truth, and nothing  
4       but the truth?

## 5 The Witness. I do.

6 The Reporter. Thank you.

7 [REDACTED] Okay. Thank you.

8 So, just logically, we are starting now -- it is about 10:00 -- 10:15, 10:13 now.  
9 We'll try to move as quickly as we can through the subject matter, but if at any point  
10 during the day, Ms. Michael, you'd like to take a break just for a comfort break or, in a  
11 couple of hours, to take a lunch break, we're absolutely amenable to that. Please just  
12 let us know.

13 And if, during the deposition, you'd like to confer with your attorney, you're also  
14 welcome to do that. Because we're doing this virtually, we would recommend, if you  
15 need to have a private conference with your counsel, both to mute and to turn off the  
16 video. And then you can come back onto the video and unmute yourself when you're  
17 ready to proceed, okay?

18                   The Witness.   Okay.

19 Any questions about that?

20 The Witness. No.

21 Okay. Great.

## **EXAMINATION**

23 BY

24 Q So we're going to start off -- we -- like I mentioned before we went on the  
25 record, we will be showing you some documents today. We're going to do that

1 primarily through the -- the screen share feature, so partly just to test that, make sure  
2 you're able to see it, I will ask [REDACTED] to bring up exhibit No. 1.

3 Can you see that document, Ms. Michael?

4 A Yes. Are we able --

5 Q Okay.

6 A -- to scroll, or do you control scrolling?

7 Q Yeah, we'll control it on our end. But, just as a logistical matter, if it's ever  
8 hard for you to see or you'd like us to, you know, zoom in or scroll to a specific place, just  
9 let us know. We're happy to do that. We want you to be able to see everything.

10 A Okay.

11 Q So this is exhibit 1. Do you recognize this document?

12 A Yes.

13 Q Okay. Is this the subpoena that you received from the select committee?

14 A Seeing only the top of it, that is what it appears.

15 Q Okay. And are you the Molly Michael that is named in the subpoena that  
16 was dated November 9, 2021?

17 A I don't see that date, but, yes, that is me.

18 Q Okay. I think it's just down the bottom.

19 There we are. The --

20 A Okay.

21 Q -- 5th day of November.

22 And, Ms. Michael, do you understand you're appearing here today pursuant to  
23 this subpoena?

24 A Yes.

25 Q Okay. Thank you.

1           So, just to set the -- your expectations, I think I'd first like to talk with you a little  
2       bit just about your professional background, your experience working in the Trump  
3       administration. And then we'll talk to you a little bit about documents that you -- you  
4       know, your sort of means of communications and documents that you might have  
5       searched and produced to us in response to the subpoena. And then we'll start talking  
6       about the time period just before and on January 6th.

7           And then, as we kind of walk through those days, we -- once we do that, we may  
8       rewind and ask you a few questions about the -- a broader time period leading up to that,  
9       just to set your expectations --

10          A     Okay.

11          Q     -- okay? So, on -- first, Ms. Michael, where do you live now?

12          A     I live in Florida.

13          Q     And are -- where are you originally from?

14          A     I'm from outside Chicago.

15          Q     Oh, great. So can you give us a brief overview of your professional  
16       background, starting from where you went to college and your employment after that.

17          A     Yes. I went to Palm Beach Atlantic University, and I -- sorry. The screen is  
18       changing here. And I -- I received a B.A. there. And I moved to D.C. after that to  
19       pursue a master's degree at the Catholic University.

20           I got my foot in the door in politics working on the Ben Carson campaign.

21           Later, in 2017, I began working at the White House in a variety of entry level roles.

22           In the beginning of 2018, I began working for the First Lady's team.

23           In spring of 2018, I began occasionally helping in the outer Oval as an executive  
24       assistant.

25           In summer of 2018, I began full time in the outer Oval functioning as an executive

1 assistant.

2 At the end of 2018, I was commissioned as a special assistant to the President.

3 And, sometime in 2020, I was elevated to a deputy assistant to the President.

4 My title was executive assistant to the President.

5 Q Okay. Great.

6 And when did you first move to D.C.? What was the time period there?

7 A I moved to D.C. sometime in the summer of 2015.

8 Q And did you -- did you work on the President's campaign in 2016?

9 A I did, yes.

10 Q In what capacity did you serve on the campaign?

11 A I served as a coordinator on the political team.

12 Q Okay. And where are you currently employed, Ms. Michael?

13 A I'm employed by Save America.

14 Q What is Save America?

15 A It's a political action committee.

16 Q Okay. And what's your -- your role or your job title there?

17 A I'm an administrative assistant there.

18 Q Okay. So, just generally, we would -- well, actually, let me ask you a few  
19 more questions about your current employment.

20 So, as an administrative assistant with Save America, just generally give us a  
21 description of what your duties are, what your responsibilities may be.

22 A My responsibilities include answering incoming phone calls, answering  
23 emails, responding to messages. I communicate with staff. I communicate with other  
24 members of Save America. I communicate with the president.

25 Q And who do you report to?

1           A    I report to Susie Wiles, who is head of Save America.

2           Q    Okay. Who -- how many people generally do you work with for -- at Save  
3         America?

4           A    Yeah, I don't know the exact number of people that work there. A handful.  
5         A dozen, something like that.

6           Q    Okay. Thank you.

7           So I'd like to ask you a few questions about your time in the -- working in the  
8         administration, starting from the time that you described, which I think is about summer  
9         of 2018 when you took on the role of executive assistant, working in the outer Oval.

10          So generally could you please describe to us what your duties and responsibilities  
11         were in that executive assistant role?

12          A    Yes. I answered the phone. I took messages. I responded to emails. I  
13         communicated messages to the President. I communicated incoming phone calls to  
14         him. I relayed messages and placed phone calls for him. I communicated his schedule  
15         to him when he had another meeting arrive. I put meetings on his schedule as he  
16         requested. And I coordinated with the chief of staff.

17          Q    Okay. Thank you.

18          And -- and were you the President's only executive assistant, or did you share  
19         responsibilities with the -- a team?

20          A    There is a team in the outer Oval that evolved over time.

21          Q    Who are -- who would you have considered as part of that team, and then  
22         why don't you tell us at the beginning of when you started, and then we'll ask some  
23         questions about how it might have evolved.

24          A    When I first started, I worked with someone named Jordan Karem and  
25         Madeleine Westerhout. Also sitting in the space in the outer Oval was Dan Scavino's

1 office. Over time, Nick Luna started, and Jordan Karem left. Johnny McEntee also  
2 worked in the outer Oval, I believe, in 2020, when I worked there. And Austin Ferrer  
3 worked in the outer Oval in the year 2020 as well.

4 Q Okay. That's very helpful.

5 And so, obviously, as I think you expect, we're going to be focusing on the time  
6 period at the very end of 2020 and into January of 2021, the end of the administration.  
7 So is it -- is it fair to say, at that point, the team that you worked with in the outer Oval  
8 included Nick Luna, Austin Ferrer? Were those the two primary people that were with  
9 you?

10 A Yes. Dan Scavino was in -- in the office as well.

11 Q Okay. And -- and how, if at all, did your, you know, job duties and  
12 responsibilities differ from Mr. Luna and Mr. Ferrer?

13 A I was the -- the primary person answering incoming phone calls. Other  
14 than that, we had a lot of shared duties. We helped each other. I don't recall  
15 something else significant about my -- my duties that varied from -- from the others.

16 Q Okay. Thank you.

17 And what about Mr. Scavino? I know you mentioned that his office was there,  
18 but how were his responsibilities any different than yours?

19 A He -- he sat in the outer Oval, but he had a different role. His title was  
20 involved in communications. He did not do the same things I did.

21 Q Okay. Thanks.

22 And I have the impression that your desks in the outer Oval are just outside the  
23 door, that main access point into the Oval Office. Is that accurate?

24 A One entrance into the Oval passed through my office.

25 Q Okay. And, while the President was working or taking meetings in the Oval

1       Office, was it either required or the practice that at least one or all of your team would be  
2       sitting outside in your desks?

3           A     We -- we were often at our desks. There wasn't a certain requirement to  
4       be present during meetings.

5           Q     Okay. So I know you mentioned earlier that one of the responsibilities that  
6       you had was communicating the President's schedule to him. Who had primary  
7       responsibility for managing or setting the President's schedule?

8           A     At what point in time?

9           Q     Let's talk specifically at the -- say, from the election through January 2021, so  
10      very end of 2020 and early 2021.

11          A     The President had a scheduling team, and the schedule was arrived at  
12      through a team effort. Hope Hicks was on that team, and I primarily worked with  
13      Michael Haidet. I --

14          Q     Could you say that name again? I'm sorry to interrupt you, Ms. Michael.

15          A     Michael Haidet.

16          Q     Okay.

17          A     He was the President's scheduler. I don't know his exact title. But he  
18      communicated the schedule to me in conjunction with Hope Hicks.

19          Q     Okay. Thanks.

20          And what role did you have in putting meetings on the President's schedule?

21          A     I had little to no role. I occasionally would recommend a certain meeting  
22      location based on my knowledge of his preference of the room; for example, the  
23      Roosevelt Room or the Cabinet Room. Occasionally, I would recommend spacing  
24      meetings out a little bit further to give more time. But, as far as the actual meeting and  
25      any meeting participants, I had no role in.

1           Q     Okay. And what about meetings that the President wished to have either  
2     with staff at the White House or outside individuals that were not on the schedule? Did  
3     you have any role in facilitating those kind of unscheduled meetings?

4           A     He would communicate to me if he'd like to add a meeting to his schedule,  
5     and I would share that with the scheduling team.

6           Q     Was there any -- any process of sort of approval or anyone else that you  
7     would run things through if the President asked you to set a meeting, or would it just go  
8     directly to the scheduling team and onto his schedule?

9           A     I believe Mark Meadows was involved in the discussion. I did not discuss  
10    the substance of his schedule myself with -- with Mark or Hope or Michael. I was given  
11    the schedule once it was determined.

12          Q     Okay. And how were you given the schedule? Did it come to you in -- in  
13    an email, or other format?

14          A     There was an email that would go out, and there was also a schedule that  
15    was printed.

16          Q     Okay. What about walk-in privileges into the Oval Office? Were there  
17    certain categories or list of staff members that did not need to have a previous, you  
18    know, invitation to a meeting in order to go speak with the President in the oval?

19          A     Generally, assistants to the President were allowed to come and go freely  
20    into the Oval.

21          Q     And then did that change at all during the time that you worked as executive  
22    assistant and then -- you know, focusing specifically on this late 2020, early 2021 period?

23          A     Assistants to the President could attend meetings. They could bring people  
24    in to meetings. At no point was I monitoring the meeting participants versus those that  
25    came to meetings. I wasn't -- I wasn't allowing or disallowing access in any way.

1           Q     Okay. Thank you.

2           And what about when people did come in to have a meeting with the President,  
3           whether it was because they would walk in with an assistant to the President or another  
4           more impromptu unscheduled meeting? Was there -- was it anyone's responsibility to  
5           kind of keep a record of that for, you know, recordkeeping purposes?

6           A     That was not communicated to me.

7           Q     Okay. So, during your time period working for President Trump as his  
8           executive assistant and focusing on this time period at the end of 2020 and into  
9           January 2021, generally how did you communicate with President Trump?

10          A     I communicated in a variety of ways. If he was in the Oval, I could speak to  
11          him in person. If he was in the residence, I could call him.

12          Q     And, if he was in the residence, would you call through the switchboard or  
13          through the White House, you know, landline system?

14          A     Yes. The White House operators were the first call if you wanted to speak  
15          to the President, and they would connect you.

16          Q     Okay. What about through a cell phone? Did the President ever call you  
17          through a cell phone?

18          A     When the President would call, the White House switchboard would be the  
19          one on the phone letting you know he was calling you. I don't know what kind of phone  
20          he was using.

21          Q     Okay. Did the -- did the President have a cell phone that was, like, an  
22          official White House device that was issued to him?

23          A     Yes.

24          Q     Okay. And was that issued by the White House Communications Agency --

25          A     Yes.

1           Q    -- to your knowledge?

2           A    Yes.

3           Q    Did he have any other phone or device?

4           A    Not to my knowledge.

5           Q    Okay. Did he ever, you know, communicate with you through text  
6         message?

7           A    No.

8           Q    What about through email? Did you communicate with President Trump  
9         through email?

10          A    No.

11          Q    Okay. Any other methods of communication with the President that we  
12         haven't discussed?

13          A    He would occasionally write my name on a document and indicate what he  
14         would like me to do with that document by writing, for example, other people's names on  
15         the document, and that I understood to mean send to those people.

16          Q    Okay. Thank you.

17          What about these -- the methods of communication that I just asked you about  
18         for means that the President communicated with you, were you aware of him using any  
19         of those means to communicate with other parties, you know, either White  
20         House -- other White House staff or outside, you know, third parties, like -- my -- I'll ask  
21         you the same email -- same question about a personal cell phone.

22          A    I'm sorry. I don't understand the question.

23          Q    That's okay. It was too long and a little unclear.

24          My question is just, do you know whether the President used a personal cell  
25         phone to communicate with others?

1           A     I didn't know him to have a personal cell phone. The only cell phone was  
2     the cell phone issued him by the White House Communications Agency, I was aware of.

3           Q     Okay. Thanks.

4           And same question about email. Did you know the President to communicate by  
5     email with anyone else other than you?

6           A     He never communicated to me by email and, to my knowledge, never  
7     communicated with email to anyone else.

8           Q     Okay. So, if the President wanted an email to be sent to someone, how  
9     would he accomplish that? Would he -- would he ask you to send it on his behalf?

10          A     Generally, he would ask me to send a message on his behalf over email  
11     originating from my email to whoever he dictated, with whatever message he dictated.

12          Q     Got it. Thank you.

13          Were there any other individuals that, you know, might send emails on the  
14     President's behalf?

15          A     I don't recall who that might be. I don't -- I just don't know.

16          Q     Okay. The official phone that you described that was issued to the  
17     President by White House Communications Agency, did he have Twitter installed on that  
18     device?

19          A     Yes.

20          Q     And -- and, during his time as -- as President, it seems apparent that the  
21     President tweeted frequently. Is that the device that you understood that his tweets  
22     were coming from in -- for the most cases?

23          A     Without firsthand knowledge, that's what I assumed.

24          Q     Okay. So, if you could describe to us generally -- I think I asked you a  
25     specific question about, you know, additions to the schedule. But, in a broader sense,

1 can you describe to us whose responsibility it was to keep track of the President's calls  
2 and meetings?

3 A What do you mean by keep track of?

4 Q I think a little bit later, we'll have an opportunity to show you some -- like a  
5 daily diary document that reflects the -- the calls and meetings that the President had.  
6 So I don't want to be very specifically narrowed to the daily diary, but just in general,  
7 those types of records that were kept at the White House of the President's activities and  
8 communications. If you could give us a sense of your understanding for how those were  
9 created.

10 A If you're referring to the diary, as I understand it, the outer Oval was not  
11 instructed to keep a document that recorded the precise time of meetings beginning.  
12 However, when time allowed, that document occasionally was produced, and that -- at  
13 the time period that you're looking at, if that document was produced, it generally came  
14 from Austin.

15 Q From Austin. Okay.

16 Are there any other records of the President's meetings or calls outside of the  
17 daily diary?

18 A Yes. When the President took phone calls through the White House  
19 switchboard, those calls were noted via email from the White House operator.

20 Q Email from the White House operator to who?

21 A To a group of people, which included me.

22 Q Okay. Did there ever come a time when those maintaining the daily diary  
23 stopped recording the President's meetings and phone calls?

24 A Throughout -- you know, days were very busy, and sometimes lots of things  
25 happened simultaneously. That record was -- was never accurate in that it was just so

1 hard. You know, you get up and use the restroom, and you missed a couple minutes.  
2 That record was not precise to the exact minute at any time. There could be gaps in  
3 days or periods of time in a day.

4 Q Okay. Thank you. That's certainly understandable.

5 We have some -- developed some testimony that, in the time period that we're  
6 focused on, on January 5th, there was a decision or an instruction to stop recording some  
7 portion of the President's daily activities, like phone calls.

8 Does that sound accurate to you? Do you remember that?

9 A I am not aware of any instruction to not record something.

10 Q Okay. So, earlier, you told us that you had a role in facilitating the  
11 President's meetings. Can you tell us: Did you ever participate in the President's  
12 meetings in the Oval Office?

13 A I do not recall ever participating in a meeting in the Oval Office.

14 Q Okay. Were you able to hear and monitor the status of his meetings from  
15 your desk in the outer Oval?

16 A To the extent the door was open -- occasionally, it was open; occasionally, it  
17 was closed -- I could overhear background noise while I did my own duties at my desk. I  
18 was not actively listening at any time.

19 Q Okay. You also told us that you had a role in placing calls for the President.  
20 Can you tell us, just in general, how that worked? Did you place those calls from your  
21 desk phone?

22 A Yes. I would place a call from my desk phone and transfer to his desk  
23 phone while he worked in the Oval or the dining room.

24 Q And what about if he wasn't in the Oval Office or the dining room? How  
25 would you place calls for him then?

1           A     If he was in the residence or on the road, he placed his calls through the  
2 operator.

3           Q     Okay. What about incoming calls for him? Is it the same process? If he  
4 was in the office, you would transfer it to his desk phone?

5           A     Sometimes calls would originate directly to me, or calls would originate to  
6 the White House switchboard, and they would transfer it to me if he was in the office.  
7 And, if he wanted to take the phone call, I would transfer it to him.

8           Q     Okay. And did you have a -- any role in kind of screening or being the  
9 gatekeeper of incoming calls to determine whether or not you thought it was appropriate  
10 to alert or raise it -- you know, alert the President about the call coming in?

11          A     I don't recall having any -- anything like that. I would share his calls when  
12 they came in. If a topic was shared with me, I would share with him. I didn't screen  
13 calls.

14          Q     Okay. Thank you.

15          We understand that sometimes President Trump would ask other staff members  
16 or aides to place calls on his behalf. Does that sound accurate to you?

17          A     By "on his behalf," you mean communicate a message for him?

18          Q     No. What I meant actually was, you know, if the President wished to make  
19 a phone call, would he ever ask an aide to place the call on a cell phone and hand the  
20 phone to the President to be able to speak?

21          A     Not that I specifically recall.

22          Q     Okay. When you placed calls for the President or transferred incoming  
23 calls to the President, did you ever stay on the line to, you know, monitor the, you know,  
24 length or content of a phone call?

25          A     I did not stay on the phone unless he instructed me to pick up the phone to

1       take down a phone number or a piece of information, which happened occasionally.

2       But I was not listening to phone calls.

3           Q    Okay. And did he ever ask you to stay on to take notes of the substance of  
4       phone calls?

5           A    Not that I recall.

6           Q    So I think you mentioned that some people might call your line in order to  
7       reach the President, as opposed to calling generally asking to speak to the President. Is  
8       that -- is that right?

9           A    Yes.

10          Q    And how would they -- describe to us the type of individual who might do  
11       that or who would have your phone number as a means of communicating with the  
12       President?

13          A    A previous caller, anyone that I had given my direct line to.

14          Q    Okay. And -- and just a rough estimate, especially at this period that we're  
15       talking about at the end of the administration, what portion of the President's calls would  
16       come in through you to your line?

17          A    I got a lot of phone calls throughout the day, a lot of them direct, and a lot of  
18       them through the White House switchboard.

19          Q    Okay. What about emails? If someone wanted to send an email for the  
20       President to review, how would they accomplish that?

21          A    I received emails that indicated the sender wanted the information to be  
22       given to the President.

23          Q    And what would you do with the -- with the message at that point?

24          A    If the information was time sensitive, it -- I would share it. If -- that's so  
25       broad. I -- I would need to be more specific.

1           Q     Sure. I believe you -- you told us earlier that the President didn't have an  
2 email account, so I assume it wasn't -- it wasn't natural for you to just forward the email  
3 to him. So, if that's not the case, how would you have communicated -- have, you know,  
4 sort of managed to get the communication in front of him? Would you have printed it  
5 out and handed it to him?

6           A     Yes. I printed emails.

7           Q     Okay. And were you the primary means for people to send emails to the  
8 President?

9           A     I didn't consider myself the primary means. I believe he received emails  
10 through other people.

11          Q     Who were those other people?

12          A     Generally, he received messages through the chief of staff, other senior  
13 administration officials.

14          Q     Okay. And how about the -- a hard copy document or memo? How were  
15 those communicated to the President? Did they go through you?

16          A     The Office of Staff Secretary compiled documents in hard copy form  
17 generally and supplied those to the President, or gave them to me to deliver to the  
18 President.

19          Q     Okay. And would that happen on an ad hoc basis, or was there generally,  
20 you know, a briefing book prepared each day for the President?

21          A     There was a briefing book of some sort in the morning and in the afternoon  
22 or late evening that was generally delivered to the President by a member of the staff  
23 secretary team. If there was another document during the day, it would be on an ad  
24 hoc basis.

25          Q     Okay. Thank you.

1           And, during your time as executive assistant to President Trump, did you have a  
2 formal reporting structure to anyone -- any other staff member?

3           A     As a commissioned officer of the President, all commissioned officers report  
4 to the President. I considered myself reporting to Mark Meadows and other senior  
5 advisers.

6           Q     Okay. And did you work closely with other members of Mark Meadows'  
7 staff in his -- sort of the office of the chief of staff?

8           A     I wouldn't say -- what do you mean by work closely?

9           Q     Well, I think you described to us the other -- your colleagues who sat with  
10 you in the outer Oval Office. You know, beyond that, who were the individuals on staff  
11 that you worked with most closely during the day?

12          A     I worked with West Wing staff, assistants to the President.

13          Q     Okay. Did you travel with President Trump while you were his executive  
14 assistant?

15          A     On very rare occasions, I went on a trip.

16          Q     What about during this time period after the election through -- through  
17 January 6th? Did you go on any trips with the President then?

18          A     I don't recall taking a trip in this period of time.

19          Q     Okay. Did you travel with the President to any campaign events in the  
20 2020 election cycle?

21          A     On a few occasions, I traveled to a rally.

22          Q     Okay. Do you recall going to any -- any rallies or events that took place  
23 after November 3, 2020?

24          A     Not that I recall.

25          Q     Okay.

1                    [REDACTED] I'll pause here to see if any of my colleagues have any followup  
2 questions?

3                    [REDACTED] Just a couple.

4                    Ms. Michael, again, I'm [REDACTED] I'm the chief investigative counsel, and I  
5 appreciate you being here. I just had a couple of quick followups from [REDACTED]  
6 questions.

7                    BY [REDACTED]

8                    Q I'm trying to get the sense as to whether or not you ever screened things  
9 that others wanted you to pass to the President but, for some reason, you did not -- a call  
10 or an email saying, "Hey, get this to the President," that, in your view, didn't merit that or  
11 shouldn't go to him.

12                  Did that ever happen? In other words, did you ever screen and not allow things  
13 that others wanted to get to him to get to him?

14                  A Generally, I had -- I did, to the best of my ability, share information with  
15 people and offices that were responsible for that information.

16                  Q So give me an example. Like, if something came in that someone wanted it  
17 to go to the President through you, would you reroute it to someone who had sort of  
18 substantive responsibility for that?

19                  A I received all kinds of requests. As an example, if a Cabinet Secretary  
20 wanted to ask the President for a tour, I would share that with the Tour Office.

21                  Q Okay. But, if somebody called and said, "Hey, can you get this" -- "can I  
22 speak to the President," did you ever say no or get -- or send that to someone else, or  
23 would you just pass that along through to him without any -- exercising any judgment as  
24 to whether it was worth his time?

25                  A Do -- do you want to speak generally or have a specific topic?

1           Q     No. I don't have any specific topic. I'm just wondering -- just trying to get  
2 a sense of how you fit within the hierarchy, whether or not you did any kind of  
3 judgmental screening as to whether or not something should or shouldn't go directly to  
4 the President. The President is very busy. He's got a lot going on, and were you  
5 rerouting or screening things away from him that others wanted to get his attention?

6           A     I recall sharing with many offices and assistants to the President information  
7 as it came in for them to review.

8           Q     Do you ever remember a time, Ms. Michael, where someone wanted to  
9 speak to the President and you didn't, in your judgment, believe that was warranted and  
10 did not pass that along?

11          A     I did not apply my own judgment. I would share phone calls that had come  
12 in that perhaps were unusual with oftentimes the chief of staff and other senior advisers.

13          Q     Okay. Was the chief of staff sort of your primary person for those kinds of  
14 judgment calls, things that were, in your words, unusual?

15          A     If we're speaking generally, yes.

16          Q     Okay. ██████████ asked you some questions about the daily diary that was  
17 prepared. Was -- was there a person in the White House on staff -- actually, an Archives  
18 employee that was responsible for compiling that daily diary?

19          A     I was aware there was a position called the diarist through the Staff  
20 Secretary Office.

21          Q     Okay. Do you remember ██████████, working with her in that  
22 capacity, the diarist?

23          A     To the best of my knowledge, I never met her. I worked with her through  
24 the Staff Secretary Office when necessary.

25          Q     Okay. And tell me more about that. When you say "when necessary,"

1       what sorts of information did you receive from her or convey to her through the Staff  
2       Secretary's Office?

3           A     The only type of information I recall conveying with or through her was  
4       when a day -- when I was able to mark down certain things, like when the President  
5       started a meeting if it was a couple minutes late or if he ended a meeting a little bit late,  
6       the actual length of the meeting; when time allowed for me to take that kind of note, I  
7       would share that with staff secretary.

8           Q     I see. Okay. So, if you were keeping track of, hey, a meeting started at  
9       9:35 and ended at 9:50, that kind of specific information, through the staff secretary,  
10      would go to Ms. Carter (ph)?

11          A     It was my understanding they shared it with the diarist.

12          Q     Okay. And then, Ms. Michael, was that your specific responsibility as part  
13      of your duties in the outer Oval, or was that sort of collectively all of you there? Just tell  
14      me who was sort of responsible for keeping track of things like that, the start and finish  
15      times of meetings or calls.

16          A     I was not instructed that that was my responsibility, nor, to my knowledge,  
17      anyone else was instructed that was their responsibility sitting in the outer Oval. At a  
18      period of time, I did take that kind of note when able. During the period of time you're  
19      looking at, that probably would have been Austin.

20          Q     Okay. Tell me more about that. You mentioned in response to  
21      ██████████ questions that Austin was doing that. Was that something that was sort of  
22      handed to him because he was more junior to you, or how did that responsibility get  
23      shifted to Mr. Ferrer?

24          A     I'm not sure I recall a specific conversation. He worked in the Office of Staff  
25      Secretary prior to his joining in the outer Oval. Presumably, he knew more about it than

1 I did.

2 Q I see. Okay.

3 And you indicated, Ms. Michael, that at no time did you get any instruction from  
4 anyone about the necessity of doing that or -- or ensuring that those kinds of times were  
5 recorded by someone? And I'm talking now about any time during your employment,  
6 but in the outer Oval.

7 A I don't recall.

8 Q Did you get any training about compliance with the Presidential Records Act  
9 at any time?

10 A As a function of onboarding, I believe there was some kind of general  
11 training. As it related to my specific role, I was not given direct instructions at any point  
12 that I recall.

13 Q Okay. So -- I'm sorry to interrupt you. Go ahead.

14 A I was just finishing that I recall.

15 Q Okay. I appreciate that.

16 So you got general training about Presidential Records Act, like everybody who  
17 was onboarded, but no specific direction about the requirements of that law that  
18 pertained to you in your role as executive assistant in the outer Oval?

19 A Not that I recall.

20 Q Okay. Did -- if you had a question about the Presidential Records Act,  
21 where would you take such a question? Where within the White House hierarchy would  
22 you -- would you get an answer?

23 A I don't recall having a specific question about the records. I understood  
24 staff secretary to be collecting records if they thought appropriate.

25 Q Okay. So at no time do you recall a question coming up, "Hey, do we need

1 to keep this or not, what does the Presidential Records Act require"?

2 Do you remember ever having any kind of question about that during your -- your  
3 time in the outer Oval?

4 A Generally, if I had a question about records, I knew staff secretary was the  
5 office to go to.

6 Q Okay. Now, [REDACTED] asked you about whether or not you were ever  
7 instructed to stop keeping track of things, and you said you were never given that  
8 instruction.

9 We understand that no daily diary was prepared after January the 4th all the way  
10 through January 20th, when there was a change in administration. Do you have any  
11 idea, A, if that's accurate, or, B, if so, why that is?

12 A I don't know that to be accurate. Like I said, it was not unusual to have a  
13 period of time in a day where the person keeping the record was unable to keep an exact  
14 record; for example, getting up out of your desk.

15 Another reason an exact record might not be kept through the outer Oval is there  
16 was a couple entrances into the Oval, not through the outer Oval. Occasionally, people  
17 would walk in one way and out another way --

18 Q Uh-huh.

19 A -- and the outer Oval couldn't know that.

20 Q Yeah. No. I take your point that it's people coming and going and very  
21 hard to keep a precise minute-to- minute account of everything going on. But there is  
22 just nothing after January 4th, like no information recorded whatsoever. And I'm  
23 wondering if you have any information as to why that is.

24 A I don't know why that is.

25 Q Okay. Did you stop keeping track of those dates and -- of those specific

1 times after January 4th?

2 A To the best of my knowledge, during this period of time, I was not taking any  
3 records.

4 Q Okay. Tell me more about that. Why did that change, that you were not  
5 taking any records?

6 A I don't recall a specific reason.

7 Q When did that occur, Ms. Michael, that you stopped keeping track of those  
8 kinds of details, as you described previously?

9 A As I was taking records, there was always gaps in days and times. I don't  
10 recall specifically ending that practice other than roughly around the time Austin began  
11 working in the outer Oval.

12 Q Okay. And you know when that was?

13 A I don't know the exact date. I believe it was sometime early or mid-2020.

14 Q Okay. Okay. And then, finally, did the President himself decide who were  
15 going to get those jobs in the outer Oval, or was that the chief of staff or someone else  
16 who made those -- those hiring decisions?

17 A I was not aware of how hiring worked.

18 Q You indicated that Austin replaced Jacob -- I forget the name you mentioned  
19 before. But, when that occurred, for instance, was that the President's decision, "Okay,  
20 Austin is going to take that place," or was that Mark Meadows or someone else? Do  
21 you have any idea who sort of made final decisions about the person -- the  
22 personnel -- the hiring of the folks that worked with you in the outer Oval?

23 A I believe you're referencing Jordan Karem and --

24 Q Yes.

25 A -- Nick Luna. I don't recall the process that Nick began working there

1 formally. He, as I did, would help out occasionally in place of Jordan, or would travel as  
2 the body man. And, when Jordan left, I don't recall the reasoning that Nick then started  
3 full time in the outer Oval.

4 Q Okay. When you were hired, Ms. Michael, who made that decision when  
5 you went -- I think you said from the First Lady's staff to the executive assistant role in the  
6 outer Oval. Who moved you or approved that or made the decision for you to take that  
7 position?

8 A I only recall the First Lady's chief of staff informing me that I would begin  
9 working in the outer Oval as soon as possible.

10 Q Okay. Not -- not the chief of staff or the President himself?

11 A At the time, I was reporting to the First Lady's chief of staff on her team.  
12 She was my boss.

13 Q Okay.

14 A She knew I was moving.

15 Q And she just said, "You're moving to the outer Oval," and that was -- that  
16 was it? There was no interview process or formal decision made by anyone else --

17 A I don't recall --

18 Q -- that you know of? Yeah.

19 A I don't recall her exact words. There was no interview. At no point was I  
20 given any special training or explained why I was moving there.

21 Q Okay. Okay.

22 [REDACTED] That's all I have. Thanks.

23 [REDACTED] Okay. Anybody else? Okay.

24 I neglected to note that Representative Murphy is on the line, too.

25 So I'll just pause to see, Ms. Murphy, do you have any questions before we

1 proceed?

2 Mrs. Murphy. Nothing here. Thank you. I yield.

3 [REDACTED] Okay. Great. Thank you.

4 BY [REDACTED]

5 Q Ms. Michael, the next topic I'd like to cover with you are some kind of, again,  
6 you know, background type questions about documents.

7 So we've talked a little bit about the ways in which you communicated with  
8 President Trump and on his behalf. I want to go a little bit more broadly to all of the  
9 types of, you know, devices and communications that you may have had with other  
10 individuals generally, you know, about work while you were the President's executive  
11 assistant in the -- in the White House.

12 So, specifically focusing on 2020 and, you know, January 2021, did you use a cell  
13 phone to communicate about work?

14 A I was issued a cell phone by the White House Communications Agency. To  
15 my knowledge, I used that phone to communicate about work-related matters.

16 Q Okay. And did you ever also use any personal phone or personal device to  
17 communicate about work matters?

18 A I had a personal phone, and I believe my lawyer submitted what text  
19 messages appeared to be related to work.

20 Q Okay. Great. Yeah. And we'll have a chance to talk about those a little  
21 bit later. Right now, I want to talk just more broadly.

22 Did you use your personal phone for work communications? And I think,  
23 because you've produced some of those to us, the answer is, at least in part, yes. Is that  
24 right?

25 A To my knowledge, what was produced is what I used -- the total of what I

1 used to speak about work on that phone.

2 Q Okay. And I believe what you produced to us are kind of standard-issue  
3 text messages, SMS messages. Is that correct?

4 A Yes.

5 Q Okay. Did you also use any other communication applications to  
6 communicate with anyone with whom you worked or about work matters?

7 A What do you mean by applications?

8 Q Sure. Like I can give a couple of examples. One would be WhatsApp.  
9 Did you use WhatsApp for work?

10 A To the best of my knowledge, I didn't have WhatsApp during that time.

11 Q Okay. What about Signal?

12 A To the best of my knowledge, I didn't use or have Signal at that time.

13 Q Okay. And, when you're saying "at that time," we're talking about the  
14 period in which you were working as executive assistant in the White House. Is that  
15 correct?

16 A Correct.

17 Q Okay. What about Telegram?

18 A To the best of my knowledge, I did not use that or have that application.

19 Q Okay. And those were a few examples. Now that I've given them, does  
20 that jog your memory about any other communication applications that you might have  
21 used?

22 A I don't recall using any other applications.

23 Q Okay. The cell phone that you used -- your personal device, that is -- do  
24 you still have the same phone that you had when you were working in the White House?

25 A Yes.

1           Q    Okay. And that's the one that you produced some text messages from for  
2 us?

3           A    Yes.

4           Q    Okay. Generally speaking, can you describe to us how you searched for  
5 potentially responsive information on that phone?

6           A    Yes. I walked through people I worked with and scrolled throughout the  
7 period of time.

8           Q    Okay. And, when you looked for people that you worked with, did you  
9 then select certain messages that you felt were responsive to the subpoena, or did you  
10 produce everything that you had, all communications with those individuals?

11          A    To the best of my knowledge, I submitted what was responsive.

12          Q    Okay. What did you do with the cell phone that you were issued by the  
13 White House Communications Agency?

14          A    That cell phone was turned in sometime around the last day of the  
15 administration.

16          Q    Okay. And do you recall to whom, whether it's an individual or an office,  
17 that you turned it in to?

18          A    I don't recall specifically. I would assume I gave it to the White House  
19 Communications Agency.

20          Q    Okay. And, on that phone, the official one that you used while you were  
21 working in the White House, how generally did you use that phone? Did you have text  
22 messages on that phone as well?

23          A    I don't recall at what point, but text messages were enabled on that phone,  
24 and I would use the text function. I would also place phone calls and receive phone calls  
25 on that cell phone.

1 [11:08 a.m.]

2 BY [REDACTED]

3 Q Okay. Thank you.

4 And what about the communication applications, either the specific ones I asked  
5 you about or any others? Did you use any of those on the official device?

6 A No.

7 Q No? Okay.

8 During the time that you served as executive assistant in the White House, did you  
9 have a government email address?

10 A Yes.

11 Q And did you only have one email address, or were there multiple?

12 A I believe I only had one email address.

13 Q Okay. At that time, did you have a personal email address as well?

14 A I do have a personal email address.

15 Q Did you ever use that personal email for communications related to work?

16 A Not to my knowledge.

17 Q Did you ever have a campaign or political email address during the time that  
18 you worked in the White House?

19 A No.

20 Q Okay. Did you ever have occasion to -- well, let me rephrase.

21 Earlier, you told us about your responsibilities that included sending emails and  
22 receiving emails on behalf of the President. Did that include campaign-related emails?

23 A I recall receiving emails from members of the campaign. I don't recall what  
24 the content was, off the top of my head.

25 Q Sure. My question was really directed to -- that would've gone to the same

1 email address, the official one that you had? Is that correct?

2 A That was, to my knowledge, the only email that I used.

3 Q Okay.

4 And, earlier, you described to us the method of people sending email to the  
5 President, that they would go to your email address and you would be responsible for  
6 communicating the content to the President.

7 Did you have that same responsibility for campaign-related communications?

8 A There were many senior administration officials that were in -- would speak  
9 to the campaign. I wouldn't consider myself speaking to the campaign in any  
10 substantive way that I recall.

11 Q Sure. Okay. I mostly just want to understand whether there were, sort  
12 of, dual tracks. Was there another, you know, person who was responsible for receiving  
13 and printing for the President emails that his campaign staff needed him to  
14 reach -- needed to reach him, kind of, in his capacity as candidate.

15 Was there a separate, kind of, responsibility or track for that, or was that also one  
16 of your job responsibilities?

17 A I don't recall being the sole point of contact at any point. I don't recall  
18 specifically a second track, like you said, being set up for campaign-related materials.

19 Q Okay.

20 Earlier, you indicated that you have a personal email address. Did you search  
21 that email for any documents that might be responsive to the subpoena?

22 A Yes, and I did not find anything.

23 Q Okay.

24 We're also aware of an email address that appears to be associated with you at  
25 the domain "████████". Have you ever had an email address with that domain?

1           A    That is my current email address.

2           Q    Okay. And is that -- that's your current email address associated with your  
3    current employment, the Save America PAC?

4           A    Correct.

5           Q    Okay. When did you start using that email?

6           A    Sometime after January 20, 2021.

7           Q    Did you search that email for any materials that might be responsive to the  
8    subpoena?

9           A    I don't believe that period of time is responsive.

10          Q    Whether it is or not, did you conduct any search of that email to see if there  
11    were any responsive materials?

12          A    No, I did not.

13          Q    Okay.

14          What about any hard-copy records from your time working in the White House?

15          Do you have any, you know, notebooks or diaries, notepads, anything like that?

16          A    I do not have hard copies that I'm aware of.

17          Q    Is that because you didn't maintain any at the time or because you didn't  
18    take them with you after your employment ended?

19          A    I don't recall maintaining any hard-copy record while at the White House.

20          Q    Okay.

21          What about computer? I assume that you had an official computer, whether it  
22    was a desktop or a laptop computer. Is that right?

23          A    Correct.

24          Q    Did you also ever use a personal computer for work?

25          A    I don't recall using a personal computer at work.

1 Q Okay.

2 Are there any other places where you might have electronic documents saved,  
3 like, either on a personal device or external hard drive, anything like that?

4 A To the best of my knowledge, documents were saved on my White House  
5 computer.

6 Q Okay.

7 So I'll ask [REDACTED] to bring up exhibit No. 1, the subpoena, again, that we  
8 showed you just a few minutes ago.

9 And if we could scroll down to the schedule that's attached to it, please.

10 So, Ms. Michael, do you recognize this document, the schedule that was attached  
11 to your subpoena?

12 A Yes, I recognize -- I'm looking at the top of what appears to be the schedule.

13 Q Okay. Thank you. Did you review this when you received your subpoena?

14 A Yes.

15 Q Did you search for records that were responsive to the schedule?

16 A Yes.

17 Q Have you destroyed, deleted, or otherwise manipulated any documents that  
18 were responsive to the schedule attached to the subpoena?

19 A No.

20 Q Okay. Have you produced all of the documents that you located that may  
21 be responsive to the subpoena?

22 A Yes.

23 Q Okay.

24 Other than your personal lawyers, I'm not asking for any of your communications  
25 with them, but did you coordinate with anyone else in responding to the document

1 requests attached to your subpoena?

2 A When I received the subpoena, I sought legal advice from Eric Herschmann,  
3 who connected me with my lawyer.

4 Q Okay. Did Mr. Herschmann or anyone else other than your lawyers assist  
5 you in conducting the search or producing documents responsive to the subpoena?

6 A No.

7 Q Okay.

8 Have you talked to former President Trump or any of your former colleagues at  
9 the White House about the select committee's subpoena to you?

10 A The President was aware of the subpoena, based on news reporting. And I  
11 remain friends and colleagues with other individuals who have been subpoenaed. I'm  
12 generally aware that they've been subpoenaed, as they are that I have been.

13 Q Who are the individuals that you're referring to there that you may have  
14 spoken to about the subpoenas?

15 A I work with other individuals who have been subpoenaed, including Taylor  
16 Budowich and Justin Caporale. And I remain friends with Nick Luna.

17 Q Okay.

18 Did anyone, including the individuals that you've identified as having spoken to  
19 about your subpoena or anyone else, attempt to influence in any way the testimony that  
20 you're giving to the select committee today?

21 A No.

22 Q Okay.

23 [REDACTED] All right. Any followup questions?

24 [REDACTED] No, thank you.

25 [REDACTED] Mrs. Murphy, anything you'd like to address?

1           Mrs. Murphy. No, thank you.

2                         Okay.

3                         BY [REDACTED]

4           Q    Okay. Thank you, Ms. Michael.

5                         So, moving into, kind of, the substance of our conversation today, I'd like to start  
6                         with January 5, 2021. And I'll start just by asking you to tell us what you remember  
7                         about that day.

8           A    I don't have any specific recollections other than one, and that is, on the  
9                         evening of what I believe was January 5th, there was music playing on the Ellipse, what I  
10                         understood to be testing the music, and the President also heard the music, and he asked  
11                         if we could open the doors to the Oval just to hear it a little bit better.

12           Q    Okay. Thank you.

13                         What else do you remember? It sounds like you were in the office that day. Is  
14                         that correct?

15           A    Yes, I was in the office.

16           Q    Okay. And who else was in the Outer Oval at work that day?

17           A    I don't specifically recall, but I would assume the Outer Oval team was there,  
18                         which included Nick and Austin and Dan.

19           Q    Okay.

20                         What else? So do you remember what time you got to work that day?

21           A    I do not recall.

22           Q    Generally speaking, when was the -- were you an early arriver at the White  
23                         House, or what time did you usually get there?

24           A    During this period of time, I generally arrived sometime in the 9 or 10 o'clock  
25                         hour.

1           Q     Okay.

2           And so, you know, I'll give you a minute, happy to let you think back about it, but  
3           what do you remember happening before the one memory that you've identified for us  
4           about hearing the music on the Ellipse?

5           A     I don't have any other specific memories of that day.

6           Q     Okay. Nothing else. What about any just general memories about the  
7           President's activities? Was he in the Oval Office taking meetings that day?

8           A     I recall he was in the Oval when we heard the music. I don't have reason to  
9           believe he wasn't taking meetings. He typically took meetings in the Oval. I don't have  
10          a specific memory of the day.

11          Q     Okay. And what about his general mood or demeanor that day? Do you  
12          have any memories about that?

13          A     I don't recall.

14          Q     Okay.

15          Well, we do have a few documents and a few, kind of, points in time of activities  
16          that we know occurred on the 5th that we're happy to run through and see if that jogs  
17          your memory. If it does and you have anything else that comes to mind, you know,  
18          we're happy to hear it.

19          So I'll direct you first to exhibit No. 2, please.

20          Ms. Michael, can you see that, and do you recognize the document on the screen?

21          A     I see the top of an email that appears to be from Maria Ryan to me, with an  
22          attachment I can't see.

23          Q     Okay. Great. Yeah, we can scroll down so that you'll see that in a minute.

24          But just since this is the first document we're looking at, this is addressed to your  
25          official White House email account. Is that correct?

1           A    Yes, that's correct.

2           Q    Okay. And who is the sender? Who is Maria Ryan? Her email address  
3    indicates "@giulianipartners.com."

4           A    I understood her to be part of Rudy Giuliani's team in some capacity.

5           Q    Okay.

6           And this is an email that -- it actually looks like it was sent quite early on the day of  
7    the 5th, so kind of maybe more accurate to think of it as the evening of the day before  
8    the 4th.

9           And Ms. Ryan, in her email, she writes, "For POTUS to review and then send to  
10   Senators."

11          Do you recall having any communications outside of this email with Ms. Ryan  
12   about this request?

13          A    I don't recall this email. If there is other email traffic about it, I'm sure you  
14   may have. I don't recall this conversation.

15          Q    Okay.

16          And the description of the attachment, the file name is "The Immaculate  
17   Deception," it has a date after it, December 15, 2020.

18          We can scroll down so you can see the first page of the attachment.

19          There we go. Maybe zoom out a little bit so we can see the whole page.  
20   Great.

21          Ms. Michael, do you remember this document?

22          A    I'm still just looking at the top of it.

23          Q    There we go.

24          This is the cover page. It says, "The Immaculate Deception: Six Key Dimensions  
25   of Election Irregularities." And then at the very bottom, it says, "The Navarro Report."

1           A     I recall Peter Navarro putting together a report, maybe multiple reports.

2     The cover of this is vaguely familiar.

3           Q     Okay. And who is Mr. Navarro?

4           A     He was an assistant to the President.

5           Q     What were his duties or responsibilities?

6           A     I believe he worked in trade. He had a portfolio involving trade.

7           Q     Okay. And what did you understand these reports to be about? What  
8     was the context here?

9           A     I generally understood this to be election-related.

10          Q     Okay. And do you know why you'd be receiving this document from  
11     Ms. Ryan?

12          A     I don't know why.

13          Q     Okay. Do you know why she wanted -- or why she wanted the President to  
14     review it and then send to Senators?

15          A     I'm not sure her intent.

16          Q     After receiving this document, did you give it to the President to review?

17          A     I don't specifically recall personally giving this to the President. I generally  
18     recall Peter having this document, and Peter frequently, to my knowledge, spoke to the  
19     President.

20          Q     Do you remember any other, whether it's on December 5th or any other  
21     day, communications between Mr. Navarro and the President about his reports?

22          A     I don't recall specific conversations. Peter would come see the President or  
23     speak with him whenever he wanted.

24          Q     Okay. Do you know whether these reports that Mr. Navarro prepared  
25     were known to the President?

1           A    I don't recall.

2           Q    Did you ever send this document on to any Senators, as, you know, kind of  
3    requested in Ms. Ryan's email?

4           A    I don't recall.

5           Q    Okay.

6           She also says in her email, "Let me know if you received the three draft  
7    documents." What do you think that she was referring to there?

8           A    I don't recall.

9           Q    Could it be this and other reports prepared by Mr. Navarro?

10          A    It's not clear to me if she's indicating the attachment or something else.

11          Q    Okay.

12          Let's look at exhibit No. 5, please.

13          So, Ms. Michael, this looks like another email sent from your White House email  
14    account on January 5th -- this is now, it looks like, at least maybe 12 hours later; this is in  
15    the afternoon, 3:48 p.m. -- to Matthew Morgan with an "@donaldtrump.com" email  
16    address.

17          Do you remember sending this email?

18          A    I don't recall sending that email.

19          Q    Okay. Who is Matthew Morgan?

20          A    He, I believe, was a lawyer on the campaign.

21          Q    And you write in the body of this email, "Could you please review the  
22    attached and discuss with Eric H? Thank you!"

23          Do you recall why you were asking Mr. Morgan to review the document attached?

24          A    I don't recall.

25          Q    Okay. Did the President ask you to send the documents to Mr. Morgan for

1 him to review?

2 A I don't recall specifically, but it's generally the case if I share something,  
3 particularly a document that I was instructed to.

4 Q By the President?

5 A By the President or others.

6 Q Okay.

7 And attached to this email that you sent to Mr. Morgan are a number of  
8 attachments, the first of which is the same report that we looked at a moment ago called  
9 "The Immaculate Deception."

10 And then there are two other attachments to it. One, the file name is "State  
11 Summaries Makridis." Does that name -- is that name familiar to you, Makridis?

12 A I don't see that yet. I just see the top.

13 Q Let's see. Sorry, it's not a great copy. It's a little pixilated even in the  
14 version that we have.

15 But at the top of the document is -- the cover page of this attachment says,  
16 "Critical Issues with the 2020 Election: A Key Battleground State Synopsis."

17 Do you remember this document?

18 A I don't recall that cover page, no.

19 Q Okay. Do you recall there being a document created by somebody with the  
20 name Makridis?

21 A I don't recall that name.

22 Q Okay.

23 And then the third attachment, if we could scroll to that one please. The file  
24 name from the cover email says "Senate Background Briefing on 2020 Fraud." And this  
25 is the cover page: "Background for Congressional Leaders. Voter Fraud Highlights for

1        2020 U.S. Election. Presented by the Giuliani Team."

2                  What is this document?

3                  A      I'm just looking at the top third of that document, and I don't recall seeing  
4                  that document.

5                  Q      Would it be helpful for you to see more of it or have a moment to look  
6                  through it?

7                  A      Sure.

8                  I've seen the rest of that page 1, I don't recall this document.

9                  Q      Okay. Do you recall seeing anything like it that kind of proceeds with  
10                 State-by-State summaries of the margin of votes and then specific bullet points describing  
11                 allegations of election fraud?

12                 A      I generally didn't review documents in any thorough way at all.

13                 Q      Okay.

14                 So, just going back, this is an email that you sent at 3:48 p.m., January 5th, to  
15                 Mr. Morgan. Do you remember if you spoke to Mr. Morgan that day?

16                 A      I don't recall speaking to him that day.

17                 Q      Okay.

18                 Who is the "Eric H" that you refer to in the body of your email here?

19                 A      Eric Herschmann.

20                 Q      And what were Mr. Herschmann's responsibilities in the White House at this  
21                 time?

22                 A      He was an attorney. He was one of the President's senior advisors.

23                 Q      Do you know if Mr. Morgan and Mr. Herschmann did discuss these  
24                 documents?

25                 A      I have no knowledge.

1           Q     Okay.

2           Let's look at another email from January 5th. This is tab 3. This is an email that  
3       was sent to a number of people. The first one listed on the "To" line has your email  
4       address. And, sorry, it's obscured a little bit by our exhibit stamp there, but it's reflected  
5       as "To: President Donald J. Trump Private WH line," and then in parentheses it includes  
6       your email address.

7           Do you know why your email address is associated with that description here?

8           A     That was not a label that I had ever seen on my email.

9           Q     Okay. Yeah, it might be because that's the way that somebody who sent  
10      the email had it reflected.

11           And, in this case, this is an email that was sent on January 5th from an individual  
12      named Bill White. It has his signature block there at the bottom of your screen.

13           Who is Mr. White?

14           A     I don't recall speaking to Mr. White. He was someone that occasionally  
15      spoke to the President or emailed. He's not someone I was very familiar with.

16           Q     Okay. How frequently did Mr. White speak with the President?

17           A     That's hard to say, but not a lot. He, I believe, was sometimes in Georgia  
18      when the President traveled to Georgia. But I don't have specific knowledge of this  
19      individual.

20           Q     Okay.

21           And if we could scroll down a little bit, Mr. White is forwarding an email that  
22      originated with an individual named Brandon Beach. He also sent the email on  
23      January 5th.

24           Are you familiar with Mr. Beach? I think it's actually Senator Beach.

25           A     I am not familiar with that name.

1           Q     Okay.

2           In the body of his email, Senator Beach writes, "Attached is the letter that I sent to  
3     Vice President Pence. I believe if we can get a 10 to 12 day extension, we can blow this  
4     wide open."

5           Do you know what he was referring to there?

6           A     I don't know.

7           Q     Okay.

8           There's a letter attached to his email that we'll show you here in a moment. It's  
9     on Georgia State Senate letterhead, from Brandon Beach, District 21. It's dated January  
10    2nd. It's a letter that appears to be directed to Vice President Pence and is signed by  
11    Senator Beach.

12          Do you remember seeing this letter?

13          A     Again, just looking at this first page, I don't recall seeing this letter.

14          Q     Okay.

15          This is the letter that Mr. Beach sent to -- or Senator Beach, excuse me, to  
16    Mr. White, and then forwarded on -- Mr. White forwards it on to you and a number of  
17    other people, including several other White House officials and Mr. Giuliani and folks  
18    associated with him.

19          Did you print this letter and give it to the President?

20          A     I don't recall doing anything with this particular document.

21          Q     Okay.

22          This is, obviously -- you know, these emails were coming in to you on January 5th,  
23    the day before the joint session of Congress was to meet on January 6th to certify the  
24    election.

25          Do you remember there generally being a topic of discussion about letters from

1 various State legislators -- legislatures on January 5th?

2 A I don't specifically recall that topic on the 5th. There was, you know, many  
3 emails and phone calls on any given day. I don't specifically remember this.

4 Q Okay.

5 What about a little bit, you know, broader than just January 5th, but do you  
6 remember during this time period leading up to the joint session of Congress discussion  
7 about letters that were coming in from State legislatures?

8 A I don't recall discussing letters like this.

9 Q Okay. Do you recall receiving letters for the President from any other State  
10 representatives or senators?

11 A I generally recall officials at many levels speaking -- or sending things in.

12 Q Okay. What about specifically related to the outcome of the 2020  
13 Presidential election? Do you remember members of State legislatures sending letters  
14 or communications to the President about that?

15 A I remember a few specific State-level officials communicating. I don't --

16 Q Who were -- oh, sorry. I didn't mean to interrupt you.

17 A No, it's okay. What was your question?

18 Q I was going to ask you, just to follow up, who were the ones that you  
19 remember?

20 A Not an exhaustive list. I remember someone named Doug Mastriano from  
21 Pennsylvania being a State official. I'm sure there are others. That's just one I recall  
22 right now.

23 Q So any others from Pennsylvania in addition to Senator Mastriano?

24 A Not that I recall.

25 Q Okay. What about others from -- other members of the legislature from

1 Georgia in addition to Senator Beach?

2 A My memory could probably be refreshed. I can't think of someone right  
3 now off the top of my head.

4 Q Okay. Do you remember communications with any State  
5 legislatures -- legislators in Michigan?

6 A I remember the President communicating with -- I believe his name was Lee  
7 Chatfield and his associate, Mike Shirkey I believe his name was. I'm pretty sure they're  
8 from Michigan.

9 Q Okay. Thank you. Any others from Michigan?

10 A Again, I'm sure my memory could be refreshed, but not -- I don't recall right  
11 now.

12 Q Okay. What about anyone from Arizona?

13 A I don't recall.

14 Q Okay. The last State I'll run through, but what about anyone from  
15 Wisconsin?

16 A Not that I recall.

17 Q Okay.

18 So this letter that we showed you a moment ago from Senator Beach, did you ever  
19 communicate with members of the Vice President's staff about this letter that was  
20 directed to him?

21 A Not that I recall.

22 Q Okay.

23 And in the cover email here, Mr. White appears to be indicating that a 10- to  
24 12-day extension, that would put -- or, he says, "put that smack in the middle of GA  
25 LEGISLATURE ACTUALLY BEING BACK IN SESSION AUTOMATICALLY (Without kemp

1 calling) see below."

2 Do you remember discussions at this time period about a potential extension to  
3 the -- for the certification of the Presidential election?

4 A That's not familiar to me.

5 Q Okay.

6 Let's look at exhibit No. 7, please.

7 So, Ms. Michael, this is another email that you sent on January 5th. This appears  
8 to be late in the evening, 11:21 p.m., an email sent from your White House account to an  
9 email address, Alice James, that looks like it's associated with Senator Graham's office.

10 Do you remember sending this email?

11 A I don't specifically recall that email.

12 Q Okay.

13 And although the email address is associated with Alice James, in the body of the  
14 email you direct your email to Senator Graham. Is that correct?

15 A That is correct.

16 Q Is that an email address that you would use to communicate with Senator  
17 Graham on President Trump's behalf?

18 A Alice is Senator Graham's assistant.

19 Q Okay.

20 In the body of the email, you say, "Hi, Senator Graham. You may want to review  
21 this and share with your colleagues as appropriate."

22 Did the President ask you to send this email to Senator Graham?

23 A My subject line, "From POTUS," indicates to me this was sent on behalf of  
24 the President.

25 Q Thank you. That's apparent. Thank you for pointing it out.

1           The attachment is described as a file name that says "The Art of the Steal," dated  
2       January 5th, "Final."

3           Are you familiar with a document called "The Art of the Steal"?

4           A     I'm looking at just the top of that document, and I am not familiar with that  
5       name, that cover page.

6           Q     We will zoom out a little bit so you can see it. At the bottom of this first  
7       page, it says, "The Art of the Steal: Volume Two of the Navarro Report," dated January  
8       5, 2021.

9           Does that refresh your recollection about what this document was?

10          A     I generally recall Peter having a few reports. This document is not familiar  
11       to me in any detail.

12          Q     Okay.

13          Do you know why the President wanted you to send this to Senator Graham and  
14       ask him to share with his colleagues?

15          A     I don't recall.

16          Q     Okay.

17          Do you remember what the -- do you remember communications during this time  
18       period about Senator Graham and whether he would object to the certification of the  
19       Presidential election?

20          A     I was not aware of that specific line of communication.

21          Q     Okay.

22          Do you know whether Senator Graham did share this document with other  
23       Senators?

24          A     I don't know.

25          Q     Did President Trump ask you to send documents to other Senators on the

1 day before the joint session of Congress?

2 A I don't recall. I'm sure you could refresh my memory. If there's another  
3 email, I have no reason to doubt that.

4 Q Does this help to refresh your recollection of other meetings and calls that  
5 the President might've had on January 5th?

6 A The cover page of this report, does that refresh my memory?

7 Q Really more the context of you sending the email to Senator Graham from  
8 the President, asking him to review this report.

9 A No, that doesn't refresh my memory on additional meetings.

10 Q Okay. Do you recall whether the President met with or spoke to any other  
11 Members -- any other Senators on the 5th?

12 A Not specifically.

13 Q And what about Members of Congress? Do you recall whether the  
14 President spoke with any other Members of Congress that day?

15 A I don't recall that day specifically at all.

16 Q Okay.

17 Let's look at exhibit 8.

18 Ms. Michael, this is another email sent by you, right around the same time. I  
19 think the one that we saw a moment ago to Senator Graham was at the end of the  
20 evening on the 5th. This is early, at 12:19 a.m., on the 6th, from you to an email address  
21 that looks like it's associated with Senator Josh Hawley.

22 Is this an email that you sent to Josh Hawley?

23 A I have no reason to doubt. That is my email address.

24 Q Okay.

25 And, again, the subject line is "From POTUS," and it attaches the same report from

1       Mr. Navarro that we looked at a moment ago. And you say, "Please see the attached  
2       from POTUS."

3           Did you talk to -- did President Trump tell you to send this to Senator Hawley?

4           A     I don't have a specific recollection, but, from the email, it appears that's  
5       what I was doing.

6           Q     Did you have any other communications with President Trump that would  
7       have given you indication of why he wanted to send this to Senator Hawley in particular?

8           A     Not that I recall.

9           Q     Okay. Do you recall whether the President spoke to Senator Hawley on the  
10      5th?

11          A     I don't recall.

12          Q     Okay.

13           So I wanted to go back -- unless there's any followup questions here?

14           I wanted to go back to the one thing that you do remember happening on the 5th  
15       that you told us about earlier, where there was music playing on the Ellipse, and I think  
16       you said that the President heard it and asked you to open the doors.

17           Who else was present with you in the Oval Office during that interaction?

18          A     I don't recall being in the Oval. I believe I was at my desk or in the Outer  
19       Oval. Like I mentioned, I have no reason to doubt the Outer Oval wasn't around for  
20       that.

21          Q     Okay. And who did open the doors at the President's request?

22          A     I believe myself and Nick Luna opened the doors.

23          Q     Okay. Did you have any other communications with the President about  
24       the music that was coming in or anything else while you were there?

25          A     Not that I recall.

1           Q     Okay.

2           Do you remember there being a group of staff from the press office who came to  
3       the Oval Office that day?

4           A     Yes. During the music playing, I believe the President called in one or two  
5       members of the press team and then, shortly after, a few more of them, to create, you  
6       know, a significant amount of the press or comms team were in the Oval for a short time.

7           Q     Okay. And about what time did that happen, what time of day?

8           A     It was in the evening. It was dark outside. I don't have any other way of  
9       marking the time.

10          Q     Okay. Were the -- your interaction with the President, was that before any  
11       members of the press team came in or during or after?

12          A     I believe the order, as I remember it, is the President heard the music, asked  
13       the doors to be opened, and then asked for the press team to come.

14          Q     Okay. And who from the press team came? I believe you said that at first  
15       it was just one or two people. Who were they?

16          A     I don't know for sure who the first people were. I believe Kayleigh was  
17       there. And the press team was not very familiar to me. I couldn't -- I didn't work with  
18       them very closely in any way.

19          Q     Okay. And how long were the members of the press team in the Oval  
20       Office with the President that day?

21          A     I recall it being short, shorter. You know, one or two songs, something like  
22       that.

23          Q     And what was the purpose of the President asking the press team, to  
24       include, you know, Ms. McEnany as well as other people on her staff? What was the  
25       purpose of asking them to come in?

1           A    I don't recall the President telling me his reasoning. I can presume: More  
2   people listening to the music.

3           Q    "More people listening to the music." Just tell me what you mean by that.

4           A    It was my understanding he was enjoying the music and he wanted to enjoy  
5   it with a few more people. The press team often, you know, was -- they were in the  
6   West Wing. It was an office very close.

7           Q    Okay.

8           And so you said the President was enjoying the music. What else do you  
9   remember about his general demeanor during this meeting or right around it?

10          A    I wouldn't call it a meeting. It was just, you know, a brief interaction. I  
11   remember him enjoying the music. I don't specifically remember anything he said.

12          Q    Okay.

13          And was Mr. Scavino there?

14          A    I don't specifically recall him being there.

15          Q    Okay. There's a video, I think, that was posted by Mr. Scavino that appears  
16   to show the music being played, you know, from the vantage point of inside the Oval  
17   Office. Are you familiar with that?

18          A    I'm not familiar with that video. Dan posted, you know, many videos.

19          Q    Do you think it's reasonable to assume it was at the same time as these  
20   interactions that you've described to us, or do you have any reason to think it was  
21   different?

22          A    I have no reason to think this was a different episode.

23          Q    Okay.

24          Do you remember whether there was any discussion about January 6th and the  
25   rally to take place the next day?

1           A    I don't recall anything specifically.

2           Q    Okay. And I guess, just to be clear, was the music being played in, kind of,  
3 preparation for the rally that was to take place on the Ellipse?

4           A    It was my understanding, I believe, at the time it was, like, a sound check of  
5 before the rally.

6           Q    Okay.

7           We understand that during the meeting that -- or the interaction, as you've  
8 described it, with the press team, that the President asked the folks in the Oval Office,  
9 "What are your ideas for getting the RINOs to do the right thing tomorrow?" Do you  
10 recall that?

11          A    I do not recall that.

12          Q    Do you recall having any other communications with the President around  
13 this time like that?

14          A    I don't recall being in the Oval for this. I generally was at my desk. I don't  
15 recall any specific conversations like that.

16          Q    Anytime, you know, from the election up through January 6th, do you  
17 remember having conversations with the President about the joint session of Congress on  
18 January 6th?

19          A    Not that I recall.

20          Q    Okay.

21          Did the President talk with you or anyone else at that time on the 5th about his  
22 speech for the following day?

23          A    I don't recall having a specific conversation about the speech. Generally,  
24 before events, I would be sent, among many other people, a copy of his speech prior to  
25 the event. I don't recall that being the case, but I have no reason to doubt I wasn't sent

1 a draft of the speech like normal.

2 Q And who generally would send you a draft of one of the President's  
3 upcoming speeches?

4 A I believe the staff secretary would be the final person to send a draft.

5 Q Would you also receive prepared remarks for any political or campaign  
6 speeches that the President would give?

7 A I didn't differentiate it. I received speeches for the President usually the  
8 day before.

9 Q Okay.

10 [REDACTED] Do you have anything?

11 [REDACTED] On that meeting?

12 [REDACTED] Sure.

13 [REDACTED] Yeah.

14 BY [REDACTED]

15 Q So, Ms. Michael, just to be clear, it sounds like you opened the doors and  
16 then left, or did you stay for this gathering when the press folks came into the Oval to  
17 listen to the music?

18 A I may have stayed briefly. I don't recall anything from that. So it  
19 seems -- my usual was to be at my desk, and that's probably what I was doing.

20 Q Okay. Did you have any role in, sort of, summoning the press folks or  
21 asking people on the President's behalf to come to the Oval?

22 A I don't specifically recall, but if he asked me to -- or others, including Nick, to  
23 get folks, I usually would do that.

24 Q Yeah. Okay.

25 And during the time that you were with him, do you remember anything that he

1 said, about the music or otherwise?

2 A My only specific memory was enjoying the music. I don't have any other  
3 memories of that.

4 Q Okay. So nothing about the next day or about RINOs, as [REDACTED] asked  
5 you, anything like that? You don't remember anything specific?

6 A I don't recall.

7 Q Did you ever hear from anyone else who was in the gathering longer than  
8 you about any of the subjects discussed?

9 A I don't recall.

10 Q All right. And we do have a picture, but -- I don't know if that's part of your  
11 plan, to show it.

12 [REDACTED] We can get it, but we don't have it right now.

13 [REDACTED] Okay.

14 We have a photograph that we might come back to, just to make sure we  
15 understand who everybody is.

16 The Witness. Okay.

17 [REDACTED] Yeah. That's all. Thanks.

18 Mr. Benson. Pardon me. Can we take a brief break?

19 [REDACTED] Yeah.

20 [REDACTED] Sure. Yeah. Let's go off the record now.

21 [Recess.]

22 [REDACTED] Okay. It's 12:02. We're continuing the deposition of Ms. Molly  
23 Michael.

24 BY [REDACTED]

25 Q Ms. Michael, I wanted to direct your attention next to exhibit No. 9, please.

1           This is an email that you sent from your official White House account. The time  
2 and date stamp that's reflected here is January 6, 2021, at 2:51 a.m.

3           I first wanted to ask you, do you think that timestamp is accurate? Were you up  
4 working at almost 3:00 a.m. that night?

5           A     I don't specifically recall being up at that hour that night, but it was not  
6 unusual for me to answer emails or send emails in the middle of the night.

7           Q     Okay.

8           So this is -- if we scroll down a little bit, it starts with an email from Doug  
9 Mastriano, who I believe is the member of the Pennsylvania Senate that you identified  
10 earlier. Is that correct?

11          A     Yes.

12          Q     Okay. And how do you know Mr. Mastriano?

13          A     He became familiar to me at some point either before or right after the  
14 election through the President's interactions with him.

15          Q     Okay. What were the President's interactions with him?

16          A     I recall at least one meeting that Doug Mastriano attended, and I recall him  
17 speaking to the President.

18          Q     When was the meeting between the President and Senator Mastriano?

19          A     I believe sometime after the election and probably before January 6th.

20          Q     Can you narrow it down within that window?

21          A     Not with any clarity. It probably happened in December.

22          Q     Okay. Who set up the meeting between Senator Mastriano and the  
23 President?

24          A     The memory of the meeting I'm referring to, my recollection is that the  
25 President asked for the meeting.

1           Q     Did he ask you to reach out to Senator Mastriano to come to meet with him?

2           A     I recall coordinating with Mark Meadows, because there were others. It  
3     was a little bit larger-than-usual group coming with Doug Mastriano. And Mark and  
4     Mark's office, I believe, also coordinated their arrival.

5           Q     Okay. Who, specifically, in addition to Mr. Meadows, in his office  
6     coordinated the visit?

7           A     I don't have a specific memory. He had a front office with, you know, a few  
8     assistants, and I believe they also coordinated his arrival. It was a larger group of people  
9     coming.

10          Q     Okay. Who were the people in the front office? Whether you remember  
11     specifically their involvement here, who generally would've been involved in coordinating  
12     such meetings?

13          A     Generally, a meeting like this would've been coordinated in part by Cassidy  
14     Hutchinson. There were others in his office, but I believe it would probably be Cassidy.

15          Q     Okay. Thank you.

16          And you said that this was kind of a larger group that came with Senator  
17     Mastriano to meet with the President. Who else was in that group?

18          A     They weren't known to me. I believe they were additional State officials,  
19     colleagues, and family members of Doug Mastriano.

20          Q     Okay.

21          There's public reporting about a meeting that took place on or around November  
22     25th following a hearing that was held about election fraud in Pennsylvania. Is this the  
23     same meeting that you're speaking of now?

24          A     Yes, I believe it is.

25          Q     Okay.

1           And the public reporting actually indicates that Senator Mastriano traveled to the  
2       White House to meet with the President [REDACTED]. Is  
3       that right?

4           A     All guests, at this time, were tested for COVID. The results were usually  
5       quite delayed.

6           Q     I'm sorry. What do you mean by that?

7           A     As in, it wouldn't be unusual to get your result after a meeting had started.

8           Q     Is that what happened in this instance?

9           A     I do have a recollection that [REDACTED] but the  
10      meeting had generally already started.

11          Q     Okay. So was he asked to leave the meeting that was already underway?

12          A     After a period of time, he left.

13          Q     Okay.

14          Were there any other White House staff who participated in that meeting?

15          A     I generally recall Mark Meadows being around for the meeting. I don't  
16      remember specifically his participation.

17          Q     Anyone else?

18          A     I don't recall.

19          Q     And what about members of the campaign staff? Do you recall if any of  
20      them participated in this meeting?

21          A     It could be. I don't recall.

22          Q     What about members of the legal team?

23          A     I don't have a specific recollection of White House Counsel being part of this  
24      meeting.

25          Q     What about outside lawyers representing the President, like Rudy Giuliani or

1 anyone associated with him?

2 A I don't remember specifically Rudy being there. It may be that he was; I  
3 just don't remember that.

4 Q Okay.

5 And I think you said that the President asked for the meeting. Why was the  
6 President asking for a meeting with Senator Mastriano and his colleagues?

7 A I don't recall him telling me the reasoning.

8 Q Okay. Just generally, during this time period, do you recall the President  
9 asking for meetings with members of State legislatures?

10 A The President frequently asked for meetings. He frequently asked for  
11 people on the phone. I didn't put people in categories.

12 Q Senator Mastriano had -- I think you said that you first, you know, came to  
13 know who he was before or right after the election. Is that right?

14 A Generally, yes. I don't recall a specific date.

15 Q Was the President asking for meetings with Senator Mastriano and other  
16 members of State legislatures connected to the election?

17 A I don't have a specific memory. This particular meeting stands out in my  
18 memory because of the larger group that came in and because [REDACTED].

19 Q Okay. But beyond just a specific memory of this meeting or  
20 communications with Senator Mastriano about this, was the President reaching out and  
21 having meetings with members of State legislatures connected to the outcome of the  
22 election?

23 A I recall generally phone calls. I don't necessarily recall another meeting of a  
24 State official like this right now.

25 Q Okay. What do you remember about the President's phone calls with

1 members of State legislatures?

2 A I just recall, you know, certain names I've already listed and those being on  
3 the -- on his calls.

4 Q And who do you remember on the President's staff or legal team being  
5 involved in either setting up or participating in those calls?

6 A I remember, you know, the chief of staff and the members of the legal team  
7 being aware of phone calls and meetings as they related to the election.

8 Q And the phone calls that you remember with State legislators, were these all  
9 individuals that the President asked you to reach out to on his behalf?

10 A I don't recall. They could've been incoming calls. He placed a lot of calls,  
11 and he received a lot of calls.

12 Q Specifically in the time period following the election through January 6th,  
13 were there any specific calls to State legislators that Mr. Meadows asked you to place?

14 A Not specifically a State legislator, but there was a phone call that Mark  
15 Meadows I recall coordinating, and that was the call in Georgia with the secretary of  
16 state. I don't recall the date of that call.

17 Q So that would've been January 2nd, I believe. Does that sound right?

18 A I have no reason to doubt that.

19 Q Okay.

20 Other than the call on January 2nd with Secretary of State Raffensperger in  
21 Georgia, do you recall Mr. Meadows asking you to set up other phone calls with members  
22 of State legislatures?

23 A Not that I recall.

24 Q Okay.

25 What about Governors in the States during this time period between the election

1 and January 6th? Was the President in touch with Governors of contested States?

2 A The President was frequently in touch with Governors throughout my  
3 experience. I didn't mark that as notable during this time.

4 Q Okay.

5 Let's come back to the document exhibit 9.

6 So this is an email that Senator Mastriano sent to you on the evening of  
7 January 5th. He addresses it to the President and says, "Attached is a memo from  
8 nearly one hundred legislators. Address the VP Pence asking him not to certify the  
9 electors from the battleground States until after we've concluded an investigation."

10 You then go ahead and forward this on to a number of different email addresses,  
11 including the staff secretary, your colleague Mr. Ferrer, the duty usher, asking that the  
12 document be added "to the early morning (if possible) list. If we could please print this  
13 for POTUS tomorrow morning, that would be great!"

14 Do you remember sending this on to be printed for the President?

15 A I do not recall sending that.

1 [12:12 p.m.]

2 BY [REDACTED]

3 Q Okay. Did you -- did the President review this letter?

4 A Not to -- I'm not aware.

5 Q Okay. If you look at the first page of the attachment, a letter dated  
6 January 5th addressed to the Vice President, and then there's pages of names of State  
7 legislators from a number of States. Do you remember the circumstances of how this  
8 letter came to be, you know, assembled and signed by all these State legislators in  
9 different States?

10 A I don't know anything about that letter.

11 Q Okay. Do you have any understanding as to why Senator Mastriano was  
12 asking the Vice President not to certify electors from contested States until an  
13 investigation was concluded?

14 A I don't know what he's talking about there.

15 Q Okay. Was this a topic of any other email -- emails with Senator Mastriano  
16 or anyone else during this time period?

17 A Not that I recall.

18 Q Okay. Do you know whether Senator Mastriano had discussed the  
19 certification of the Presidential election with President Trump?

20 A Not to my knowledge.

21 Q Okay. If you look at exhibit 10, please. This is an email from you, also  
22 quite early in the morning of the 6th or maybe more accurately described as late at night  
23 the 5th, 2:50 a.m., from you to Marc Short. Who is Marc Short?

24 A He was the Vice President's chief of staff.

25 Q And you forward on the email that we were just discussing a moment ago

1 from Senator Mastriano. Why were you sending that to Mr. Short, the Vice President's  
2 chief of staff?

3 A I don't recall specifically. I would share things generally. I see that the  
4 Vice President is mentioned. I can assume I shared that as just an FYI. I don't recall my  
5 reasoning.

6 Q Even though the email from Senator Mastriano is clearly addressed to the  
7 President himself, you went ahead and forwarded it on to the Vice President's Office.  
8 Would you have done that on your own, you know, based on your own judgment?

9 A I don't recall.

10 Q Just generally speaking, if an email was addressed to the President, would  
11 you have felt, you know, it's appropriate to send it on to other members of the staff,  
12 including the staff of the Vice President, or did President Trump ask you to do that?

13 A I don't recall President Trump asking me to do that, and I don't specifically  
14 recall my reasoning.

15 Q Okay. Did you have any communications with Mr. Short about this letter or  
16 otherwise on the evening of the 5th?

17 A Not that I recall.

18 Q Do you recall any other instances where you forwarded to Mr. Short or other  
19 members of the Vice President's staff communications on the 5th or leading up to  
20 January 6th?

21 A I generally shared information that was related to them that I received. I  
22 don't recall anything specific.

23 Q I believe there's a few other letters that Senator Mastriano submitted, as  
24 well as members of other State legislators. Did you accepted those on to the Vice  
25 President's staff?

1           A    If you have an email like that, I don't recall specifically.

2           Q    Okay. I mean, at this time, the joint session of Congress, the Vice President  
3    was set to preside over the joint session the following day. Is the reason why you were  
4    sending these letters because of the Vice President's role in the joint session?

5           A    I don't recall.

6           Q    What was your understanding at the time of the relevance of these letters  
7    from State legislators to the joint session?

8           A    I don't recall forming an opinion or having any understanding of what those  
9    letters meant.

10          Q    Okay.

11          BY [REDACTED]

12          Q    With respect to Senator Mastriano, Ms. Michael, do you know whether or  
13    not he had any role sort of coordinating the activity of State legislators across the  
14    country? The letter purports to be from 100 such legislators in different States.

15          A    I don't recall knowing his role in that way, no.

16          Q    Did anybody, the President or Mr. Meadows or anyone, mention that he had  
17    such a role, a sort of coordination role beyond Pennsylvania?

18          A    Not that I recall.

19          Q    All right. And what if anything did you know about Mr. Mastriano or did  
20    you learn about him over this period of time?

21          A    From what I shared that meeting, I recall, formed the predominant  
22    understanding of him. He came in with a large group, he was from Pennsylvania, and he  
23    communicated with the President.

24          Q    Okay. Did you have any familiarity with his involvement in election-related  
25    issues in Pennsylvania or elsewhere?

1           A    Not that I recall.

2           BY [REDACTED]

3           Q    I want to turn really quickly, Ms. Michael, to exhibit 9, which we just looked  
4       at, which is the email that you forward early morning or late night, depending on how you  
5       want to characterize it, on January 6th, where you write: Also adding this to the early  
6       morning (if possible) list. If we could please print this for POTUS tomorrow morning,  
7       that would be great.

8           Can you just explain to us, what is the early morning list?

9           A    I actually -- I don't know that. He, like I mentioned, had like a morning daily  
10      brief. That's probably what I was referring to in that.

11          Q    So the best that you can recall, when you wrote "to the early morning list,"  
12      you were probably referring to a brief that the President received in the mornings?

13          A    Or a collection of documents one could call a brief.

14          Q    Can you explain to us, at least generally if you don't recall the specific  
15      request, what made it to the brief for the President in the mornings?

16          A    In my understanding, staff secretary would compile things like news articles,  
17      letters from heads of state. There was a classified component that the President's  
18      briefer would also deliver sometimes electronically. It was a compilation of things  
19      predominantly compiled by staff secretary.

20          Q    Who, to your knowledge, would have input as to what could go into this  
21      compilation of documents for the President's review?

22          A    I don't believe that was explained to me at the time. I could assume the  
23      chief of staff and staff secretary were aware and had input on that.

24          Q    And you as well?

25          A    Yes. That indicates that I added something here in that email.

1           Q     Okay. Do you recall any other documents that you may have sent for the  
2 President's review for January 6th that morning?

3           A     No. It wasn't unusual for me to share things. It's hard to remember a  
4 specific day like this.

5           Q     So sitting here today, you don't remember what documents might have  
6 been provided to the President for -- his compilation of documents that brief the morning  
7 of January 6th?

8           A     Correct, I don't recall.

9           Q     Do you recall whether anyone else sent documents, whether staff secretary  
10 or anyone else, for President Trump to review for the morning of January 6th?

11          A     I don't recall.

12          Q     So this email, as we've discussed, it's the email itself from Mr. Mastriano or  
13 Senator Mastriano's address to the President, but as we looked at the letter itself is from  
14 Vice President Pence. Do you recall why you would have as part of the -- why you would  
15 ask the staff secretary to put in this brief for the President a letter that was directed or  
16 addressed to Vice President Pence?

17          A     I don't recall.

18          Q     Do you recall if the President received any sort of compilation of documents,  
19 a briefing or a booklet, during the afternoon of January 6th?

20          A     I don't have any reason to believe the evening compilation didn't go on as  
21 usual. That was usually dropped off independently, later in the evening by staff  
22 secretary.

23          Q     So you don't have a specific recollection, but you would assume that it would  
24 have proceeded as usual on the 6th that evening?

25          A     Yes.

1           Q     Do you recall around what time these booklets or these briefing documents  
2 would be sent out to the President?

3           A     It could be a range of times, late, you know, 9:00 or 10:00, or if it was ready  
4 to deliver, it could be more like 7:00, 6:00.

5           Q     In the evening?

6           A     Yes.

7           Q     Would anyone else have access to the briefing document or the compilation  
8 of documents that would be provided to the President or was it solely for President  
9 Trump?

10          A     It was my understanding it was compiled by staff secretary. I don't know  
11 who reviewed it before or after it was given to the President.

12          Q     How about just any copies that might have been distributed to other  
13 individuals in the White House, do you know if that happened?

14          A     I'm not aware of copies of that.

15          Q     Okay. Thank you.

16                 BY [REDACTED]

17          Q     Okay. Staying on this document -- and actually, if we could go to the first  
18 page of the letter, please, [REDACTED] -- Ms. Michael, we have information that  
19 indicates that this letter that's signed by several hundred or 100 or so individuals,  
20 members of State legislatures, is connected to a phone call that took place on January 2,  
21 2021, that was organized by -- at least in part by a group called the Amistad project.

22          So first question for you is, do you know what the Amistad project is?

23          A     Hearing that word, I don't think I've heard that before.

24          Q     Okay. What about an individual named Phil Kline? Is he known to you?

25          A     That name is not familiar.

1           Q     Okay. Do you recall the President participating in a Zoom call with a group  
2     of State legislators, I think there may also have been Members of Congress involved, on  
3     January 2nd?

4           A     To my knowledge, he didn't usually participate in a video Zoom sort of call  
5     like that. He took many calls, many a day. I have no reason to remember a specific  
6     one like that.

7           Q     So -- and I think it was a Zoom call for everyone else, but the President  
8     participated by phone, by calling in. We have reason to believe that this was somewhat  
9     of an impromptu or it was added to the schedule and that you were asked to coordinate  
10    the President dialing in to this call. Does that refresh your memory about this?

11          A     It doesn't. He would take, you know, impromptu calls, but if you have  
12    more information, it may refresh my memory.

13          Q     Okay. The -- do you remember anyone who worked for Steve Bannon, a  
14    colleague of Steve Bannon's, who asked you to coordinate the President's participation in  
15    this call?

16          A     I don't specifically remember a call like this. I do know whom on Steve  
17    Bannon's staff would coordinate things on behalf of Steve Bannon.

18          Q     Okay. Who would that be?

19          A     Her name is Alexander Preate.

20          Q     Okay. And how often would Ms. Preate -- how often were you in touch  
21    with her when you were working in the White House?

22          A     She was -- she was an employee of the White House in roughly 2017. After  
23    Steve Bannon left, I believe she also left. And then, very occasionally, I believe I spoke  
24    with her.

25          Q     Okay. So do you -- after, you know, remembering the connection with

1       Ms. Preate, does that refresh your recollection about her asking you to get the President  
2       to dial in to this call with State legislators and Members of Congress?

3           A     No, but a call like this, he spoke with Members of Congress. It's not an  
4       unusual occurrence.

5           Q     Okay.

6           A     I don't recall specifically this date.

7           Q     Okay. Do you know whether -- when Ms. Preate reached out to you to ask  
8       for the President to, you know, participate in a call like this, would that indicate to you  
9       that Mr. Bannon was involved?

10          A     I know this individual to be working for Steve, but, again, I'm not -- I don't  
11       remember the specific instance.

12          Q     Okay. I'm more curious about whether that would mean that Mr. Bannon  
13       was -- you know, would he have asked her to reach out to you on the President's behalf  
14       for something that he himself wasn't participating in, or is it likely to assume that he was  
15       if he was asking for the President to participate in a call?

16          A     I don't think I could draw that conclusion.

17          Q     Okay.

18          Anything else about the call? Okay.

19           BY [REDACTED]

20          Q     Ms. Michael, do you recall, in connection with any phone calls that the  
21       President participated in, in early January 2021, receiving a massive binder of materials  
22       that you were to distribute to others or make copies of?

23          A     I don't specifically recall a binder, though making copies and distributing  
24       them was something that I generally did on the President's direction.

25          Q     Do you ever recall receiving, you know, a large, I guess, compilation of

1 documents and making, you know, 10, 20-plus copies, so indicating it was a fairly large  
2 meeting, in the early January 2021 period?

3 A Generally, if I made copies or duplicates, I was just printing things. I don't  
4 recall ripping a binder to shreds and making lots of copies of it. That would've been a  
5 big pain.

6 Q Yeah, and our understanding is it was a pain, so I don't know if you have any  
7 recollection of working with other aides in the White House of making photocopies of  
8 documents, potentially evidence of election fraud, in the early January 2021 period to  
9 disseminate to members of a meeting.

10 A Like I said, I don't -- I don't remember a hard copy binder. I do generally  
11 recall making copies of things at the President's direction.

12 Q Do you recall ever making copies of, you know, affidavits of alleged voter  
13 fraud on, you know, after being requested by President Trump to do so?

14 A I didn't really study documents I was making copies of. I was working  
15 quickly and collating. I don't specifically recall looking at a legal document like that.

16 Q Understanding that you might not have reviewed it carefully, do you  
17 remember it being represented to you like this is evidence of voter fraud or these are  
18 affidavits regarding potential voter fraud in the election? Do you recall that?

19 A Being an assistant, I wasn't part of meetings. Generally, no one explained  
20 things to me. I wasn't a senior official.

21 Q Yeah, and completely understand that. This is just a question of whether  
22 anyone told you, regardless of your title, your stature, whatnot, involvement in a  
23 meeting, they represented to you that a document purported to be, you know, evidence  
24 of voter fraud or the document contained allegations of voter fraud in connection with  
25 the 2020 election, if you ever recall being told that and, you know, making copies of that

1       document or disseminating it to others in the White House.

2           A     I don't recall a specific conversation, being told something was something.

3       I do remember making copies.

4           Q     Making copies of documents concerning purported election fraud or just  
5       making copies of documents in general?

6           A     Making copies of -- generally and also election-related material.

7           Q     Okay. Do you recall who you -- if you did anything with those documents  
8       that you made copies of?

9           A     Whatever I did with them was at the direction of the President or chief of  
10      staff or other administration senior officials.

11          Q     And do you recall what they directed you to do with the documents?

12          A     Generally, I was asked to send documents to other people.

13          Q     And do you recall what other people you were asked to send documents to?

14          A     I did this frequently. The list is large. The President communicated with  
15      Members of Congress, Governors, other officials frequently.

16          Q     Do you remember ever sending documents concerning purported election  
17      fraud to Governors, as you just mentioned?

18          A     I would have to see a specific email. Generally, I sent election-related  
19      material to whoever I was asked to.

20          Q     Do you have a recollection of sending to Governors? And this isn't a  
21      memory test. You had mentioned Governors, so that's why I'm asking about Governors.

22          A     I said Governors because the President communicated with Governors. I  
23      don't specifically remember an election-related item or material sent to Governors, but I  
24      don't doubt that I did that.

25          Q     Okay. And how about Members of Congress, similar answer?

1           A     Yes. Members of Congress I was instructed to send material to by the  
2 President.

3           Q     Do you have any recollections of specific Members? I mean, I'll -- we had  
4 discussed an email chain with -- or an email to Senator Hawley and also Senator Graham.  
5 Those were Navarro -- a Navarro report, if you recall, which contained allegations  
6 regarding election fraud. Do you remember anyone else besides Senator Hawley and  
7 Senator Lindsey Graham, sending election-related materials to during the November 2020  
8 to January 6, 2021, time period?

9           A     I generally recall sending things like that. I don't specifically recall who I  
10 might have done that to. It was always at the direction of the President.

11          Q     Okay.

12                 BY [REDACTED]

13          Q     Ms. Michael, I wanted to ask you a few more questions about the meeting  
14 that you described with Senator Mastriano from Pennsylvania and other associates there.  
15 I -- can you tell me -- and forgive me if you already covered this, but I just want to check.  
16 Do you have any understanding of how that meeting came to be?

17          A     I recall the President asking for that meeting to be --

18          Q     Okay. Sorry, I didn't mean to interrupt you.

19          A     No. I recall the President asking for that meeting to be set up.

20          Q     About how -- how far in advance was the meeting set up?

21          A     I believe it was the day of. I believe they came in the same day it had been  
22 requested.

23          Q     Is that unusual?

24          A     It's occasional. It was occasional.

25          Q     And it was your impression that the attendees were traveling from

1 Pennsylvania for the meeting. Is that correct?

2 A Yes.

3 Q Okay. I think I did ask you whether there were other White House staff  
4 that participated. What about any members of the President's legal team, were they  
5 involved in coordinating the meeting or participating in it?

6 A I don't recall.

7 Q Okay. Was Mr. Giuliani involved?

8 A I don't recall his attendance at that meeting, but I have no reason to doubt  
9 he could've been there.

10 Q Okay. What about Jenna Ellis?

11 A I don't -- I don't recall her being there either, but she may have been.

12 Q Okay. Are you familiar with an individual named Katherine Friess?

13 A I am familiar with that name.

14 Q Who is she?

15 A I understood her to work on Rudy's team.

16 Q Okay. In what capacity was she working on Rudy's team?

17 A I don't know if I knew the capacity. She seemed to be somewhat senior on  
18 his team.

19 Q Was she known to you before the election or only after?

20 A I don't recall knowing her prior to the election.

21 Q Okay. Did she participate in the meeting with the Pennsylvania legislators?

22 A I don't recall her being there.

23 Q Okay. We talked about [REDACTED]

24 What about another member of the Pennsylvania Senate named Kim Ward?

25 A I -- I don't recall specific names of other individuals there. I do know that

1 Doug Mastriano seemed to be the one collecting, bringing the people there.

2 Q Okay. I know that you described that the President had other  
3 communications with Senator Doug Mastriano around this time period. Do you know if  
4 a Senator Ward in Pennsylvania, the President also had communications with that  
5 individual?

6 A That name is familiar, but it's also a common name. I don't specifically  
7 remember communications with Kim Ward.

8 Q I think there's also another Senator in Pennsylvania or another legislator  
9 named Judy Ward. Do you remember that name?

10 A I don't know that name.

11 Q Okay. What about a Phil Waldron, do you know who that is?

12 A I am aware of that name, yes.

13 Q Okay. Who is he?

14 A I believe he was connected possibly to Rudy or maybe Michael Flynn.

15 Q What gives you that impression?

16 A I -- I don't recall. I don't recall.

17 Q Did Mr. Waldron ever participate in meetings with either Rudy, Mr. Giuliani,  
18 or General Flynn?

19 A I believe on one occasion he had an in-person meeting, but it's not a specific  
20 recollection.

21 Q Did he participate in this meeting organized by -- or, you know, that involved  
22 Senator Mastriano and his colleagues?

23 A Not that I recall.

24 Q Okay. What else do you remember about the one occasion that you just  
25 mentioned of Mr. Waldron meeting with the President?

1           A     My only recollection is he was part of a group.

2           Q     Who else was in that group that you remember?

3           A     I don't recall. It may have been Rudy. I don't recall.

4           Q     Okay. Could it also have been General Flynn, or do you remember it being  
5 more Rudy's team?

6           A     I don't know.

7           Q     Okay. And what generally was the timeframe where Mr. Waldron met with  
8 the President?

9           A     Sometime after the election, and I couldn't give a month.

10          Q     What was the purpose of the meeting?

11          A     I don't recall.

12          Q     Okay. Just going back to the meeting that I believe happened on  
13 November 25th, the meeting that we've been talking about with Senator Mastriano, what  
14 was your understanding of the purpose of the meeting?

15          A     I don't believe I was informed or formed an opinion on the purpose.

16          Q     Okay. Do you recall the President characterizing the meeting to you either  
17 before or after it?

18          A     No, not -- no, I don't recall.

19          Q     Okay. We understand that the -- during this meeting President Trump may  
20 have asked the -- these members of the Pennsylvania legislature to hold a special session  
21 to appoint Republican electors, electors for the Trump-Pence ticket for the electoral  
22 college vote. Do you remember that?

23          A     I don't recall.

24          Q     Okay. Did you hear anything generally about the concept of a special  
25 session during this time period?

1           A    That's not familiar to me.

2           Q    Okay. And that was -- my question is not only just limited to Pennsylvania  
3         but in general, did you -- were you aware of any communications about convening a  
4         special session of any legislature during this time period?

5           A    I don't recall.

6           Q    Okay. We also understand and have evidence that the meeting ended  
7         early, earlier than planned, and that that may possibly have been because the  
8         Pennsylvania delegation or the members of the Pennsylvania legislature that were  
9         meeting with the President told them that they would not be doing what he had asked  
10       about convening a special session. Is that right?

11          A    Well, the meeting was not planned, so I don't recall there being an early  
12       ending to this meeting. It was all unplanned. I don't recall a result of the meeting.

13          Q    And I know you described to us earlier that there was something somewhat  
14       notable about the fact that, you know, Senator Mastriano was already in the meeting and  
15       [REDACTED]. So what do you remember about his exit, and  
16       how much longer did the meeting continue after he left?

17          A    I don't recall the timeline. I do remember members of the medical unit  
18       were close by, or that's where Doug and his family were directed.

19          Q    Okay. So you don't have a general sense of -- did the meeting end with his  
20       exit, or did it continue in his absence?

21          A    I believe there was some remaining meeting after he left. I don't recall  
22       how long.

23          Q    Okay. Do you remember the President's demeanor after the meeting  
24       ended?

25          A    I don't recall.

1           Q     Okay. Did the President ask you to do anything? Did he give you any kind  
2     of followup tasks or assignments after the meeting?

3           A     I don't recall.

4           Q     Okay. Any conversations with the President after this meeting with the  
5     Pennsylvania legislators, whether it was, you know, immediately after or sometime later,  
6     that pertains to the content of the meeting?

7           A     I don't recall.

8           Q     Okay. Anything else on that?

9                 BY [REDACTED]

10          Q     Ms. Michael, I wanted to go back just a little bit. You had mentioned  
11     someone named Mr. Phil Waldron and that it seemed like you recalled him being at the  
12     White House for a meeting. Do you recall why he was meeting with President Trump?

13          A     I don't recall.

14          Q     Do you know whether Mr. Waldron was doing his own investigation related  
15     to allegations of election fraud in the 2020 election?

16          A     I generally know he was interested in election-related information because  
17     he, in my memory, is associated with others during that time period.

18          Q     Others who were doing work related to the 2020 election?

19          A     Correct.

20          Q     Do you know whether Mr. Waldron talked to President Trump, had a  
21     meeting with President Trump about his work related to the 2020 election?

22          A     I have no knowledge of the contents of a meeting or phone call with him.

23          Q     Do you recall whether in that meeting that you remember if Mr. Waldron  
24     came with other people to the White House?

25          A     I believe he came with other people.

1           Q     Do you recall whether they were former members of the government in the  
2 intelligence realm?

3           A     At this time, people would come, and I -- they were not familiar to me. I  
4 don't recall what you described.

5           Q     Do you recall ever hearing Mr. Waldron talking about looking at information  
6 that the NSA may have to -- to -- that would help his investigation related to purported  
7 allegations of election fraud in the 2020 election? Does that sound familiar?

8           A     I don't recall.

9           Q     Do you recall if, in this meeting that you remember, Mr. Waldron had any  
10 documents with him?

11          A     I don't recall.

12          Q     Okay. And I believe you mentioned that you thought he might have been  
13 associated with General Flynn. Do you have a memory of him being in a room with  
14 General Flynn, or you were just remembering that both of them might have been doing  
15 work around the 2020 election, and that's why you think they might have -- you might  
16 have -- he might have been associated with General Flynn?

17          A     The latter.

18          Q     Okay. Do you recall whether President Trump had any direct conversations  
19 with Phil Waldron in the November -- aside from that meeting, between November 3,  
20 2020, and January 6, 2021?

21          A     I don't recall specific phone calls.

22          Q     Okay. And were you aware of Mr. Waldron before November 3, 2020, to  
23 the best of your recollection?

24          A     His last name is a family name. It's the only reason the name stands out to  
25 me. I don't recall knowing him, and he's not related to me, to the best of my

1 knowledge.

2 Q Okay. We won't hold it to you -- hold you to it. That's it for me. Thank  
3 you.

4 [REDACTED] Okay. I think I'd suggest this is probably a good breaking point  
5 for -- if we want to take a little bit of a longer break at this time.

6 The Witness. Okay.

7 [REDACTED] Okay. Let's go off the record now.

8 [Recess.]

1 [1:47 p.m.]

2 [REDACTED] Let's go back on the record. It's 1:47 here in Washington. We're  
3 continuing the deposition of Ms. Molly Michael.

4 BY [REDACTED]

5 Q Ms. Michael, I'm going to continue talking with you about the January 5th  
6 and 6th timeframe, so I'd like to direct your attention to exhibit 12, please.

7 Okay. And so, yeah, if we can scroll down to the bottom of this first page, this  
8 appears to be an email from the individual we discussed earlier, Ms. Maria Ryan at  
9 Giuliani Partners, to you at your official email address. This is sent, again, very early in  
10 the morning of January 6th, a little before 1:00 a.m.

11 And in the body of the email, it says, "Per Rudy please print for POTUS to share  
12 with VP at breakfast meeting."

13 Do you see that, Ms. Michael?

14 A I do, yes.

15 Q Okay. Do you remember receiving this email?

16 A I don't remember receiving this.

17 Q Okay.

18 Was there a breakfast meeting between the President and Vice President on  
19 January 6th?

20 A I don't recall a meeting like that.

21 Q Okay. Was there any sort of standing meeting at breakfast between the  
22 President and Vice President?

23 A Not that I recall.

24 Q Do you know why Ms. Ryan would have thought that there was a meeting  
25 between the President and Vice President over breakfast?

1           A    I don't know what she was thinking.

2           Q    Okay. Did you have any communications with Ms. Ryan, Mr. Giuliani, or  
3       any of their associates about a meeting between the President and Vice President in this  
4       timeframe?

5           A    Not that I recall.

6           Q    Okay.

7           If we could scroll up a little bit, we can see the email that you sent afterwards.  
8       So this is later in the morning, at a more reasonable hour on January 6th, 9:36 a.m. You  
9       sent it on to Marc Short, the Vice President's chief of staff. And you write, "Passing  
10      along."

11          Did President Trump ask you to send this email to the Vice President's chief of  
12       staff?

13          A    Not that I recall.

14          Q    Okay. Did you interpret the email from Ms. Ryan as a request to share the  
15       documents directly with the Vice President's chief of staff?

16          A    I don't recall what I interpreted from this.

17          Q    Okay. Well, thinking back now, do you remember, was it a matter of  
18       course for Mr. Giuliani or his colleagues to send information for the President and for you  
19       to forward it on to the Vice President's chief of staff?

20          A    I would generally share information if it related to someone. In this case, it  
21       looks like the VP, so I shared it with Marc Short.

22          Q    Okay.

23          And attached is a letter. You can just look at the first page. Somewhat similar  
24       to a couple letters we looked at before. This one is on Arizona House of Representatives  
25       letterhead, dated January 1st.

1           Sorry. We'll get the screen back up in a moment.

2           I'll go ahead and ask you, Ms. Michael, while we're working out our tech issue on  
3       this side: Do you know whether the email and the attachment that Ms. Ryan sent to  
4       you was shared with the Vice President?

5           A     I don't know.

6           Q     And do you have any thoughts about why at late at night on the evening of  
7       the 5th and the early morning of the 6th Mr. Giuliani's associates were sending these  
8       materials for the Vice President?

9           A     I don't know.

10          Q     Was it in connection with the meeting of the joint session of Congress to  
11       certify the Presidential election the next day?

12          A     I don't recall making any assumptions.

13          Q     Okay. You were aware that that was the event of the January 6th, was to  
14       be a joint session of Congress to certify the election results; is that right?

15          A     Yes, I was aware.

16          Q     Okay. And did you think that these emails coming in from Mr. Giuliani and  
17       his associates were related to that?

18          A     I don't recall studying these documents or understanding what they were.

19          Q     Okay.

20          Okay. Great. Thank you, [REDACTED]

21          So this is an email -- or, the attachment to Ms. Ryan's email is a letter on the  
22       Arizona House of Representatives' letterhead stationery. And it has, you know,  
23       signatures by a number of individuals. There's quite a few names listed. Many of the  
24       signature blocks are empty. Some of them are filled with signatures of people that  
25       appear to be members of the Arizona legislature.

1           Do you remember this letter?

2           A    I don't recall that letter.

3           Q    Did you print it for the President on January 6th?

4           A    I don't recall.

5           Q    Okay.

6           Letters like this and the ones that we were looking at earlier today before our  
7       lunch break, did you have any discussions with other White House staff about letters from  
8       members of State legislatures?

9           A    Not that I recall.

10          Q    Okay.

11          Let's look at one more similar email, exhibit 13, please.

12          Perfect.

13          So the first email, at the bottom of the page here, is another email from Ms. Ryan  
14       right around the same time as the one we were looking at a moment ago, January 6th,  
15       12:52 a.m., to you at your official email address at the White House.

16          In the body of the email, it says, "Per Rudy. Please print for POTUS to share with  
17       Vice President."

18          Do you recall receiving this email?

19          A    I do not recall.

20          Q    Did you print it for the President to share with the Vice President?

21          A    I don't recall.

22          Q    Okay.

23          And you again forwarded this email, you know, at around 9:30 in the morning on  
24       the 6th to Mr. Short. In this case, your message read, "Just the messenger -- see below."

25          Why did you write "just the messenger" in this case?

1           A     I was sharing that email. I had nothing to do with the information. I was  
2 forwarding the email as a messenger.

3           Q     Okay. I don't mean this to sound cute or anything, but wouldn't that be  
4 implied by your having forwarded the message and, you know, it being seen to have  
5 originated with Ms. Ryan at Giuliani Partners?

6           A     I don't recall typing that email. Reading it back, I can assume my meaning  
7 was "I'm forwarding this email."

8           Q     Okay. Is it fair to read into the fact that you said "just the messenger" any  
9 sort of characterization of what the content of the email was?

10          A     Like I said, I had -- I don't recall that document. I don't recall what I meant  
11 other than I'm sending it to Marc as the messenger.

12          Q     Okay.

13          I wanted to, before we leave January 5th, talk with you a little bit about meetings  
14 between the Vice President and the President on the 4th -- January 4th and 5th. It's  
15 been widely reported that such meetings did occur, so what can you tell us about when  
16 the President and Vice President met during those 2 days before January 6th?

17          A     I don't have specific recollections of meetings or the number of meetings in  
18 those days specifically. Generally, the President and Vice President saw a lot of each  
19 other. I have no reason to remember meetings that were routine.

20          Q     Okay. And, generally, it would be helpful for us to get a sense of, what was  
21 the routine for meetings between the President and Vice President?

22          A     They saw each other as their schedules allowed, which included scheduled  
23 meetings and scheduled lunches over the course of a week.

24          Q     Would they also have, you know, unscheduled or impromptu meetings, or  
25 were they usually planned in advance?

1           A    The President would have impromptu meetings. He would call people into  
2       his office.

3           Q    And did that also apply to the Vice President?

4           A    Yes.

5           Q    Okay. Did they have any standing meetings or lunches?

6           A    By "standing," it was routine. Not necessarily the day was always the  
7       same, but they had a routine of having lunch, as I recall, about once a week. And the  
8       Vice President had other meetings with the President throughout the week.

9           Q    Okay.

10          And for the routine lunch between the President and Vice President as their  
11       schedules allowed, who else participated in those lunches?

12          A    Occasionally, it was one-on-one, just the two of them. And, other times,  
13       the chiefs of staff would attend.

14          Q    So, during the time period that we're focused on today, after the 2020  
15       election, those individuals would've been Mark Meadows and Marc Short. Is that  
16       correct?

17          A    Correct.

18          Q    Okay.

19          Do you recall whether there was a planned lunch between the Vice President and  
20       the President on January 4th or 5th?

21          A    I don't recall.

22          Q    Okay.

23          You said that, generally speaking, the President and Vice President saw a lot of  
24       each other. Did that change at any point during the administration?

25          A    Their schedules, you know, were busy, and travel kept them from their

1 routine. I don't have a specific memory of any significant change in that.

2 Q Okay. Including in the time period leading up to January 6th? So, in early  
3 January 2021, would your testimony still be that they were still seeing a lot of each other?

4 A They frequently saw each other, yes.

5 Q Okay. What about after January 6th?

6 A I believe they continued to see each other.

7 Q Okay.

8 It's been widely reported that there was a meeting between the President, the  
9 Vice President, several members of the Vice President's staff, and at least one lawyer  
10 representing President Trump on January 4th. Do you remember that?

11 A I don't specifically recall that.

12 Q Okay. This is a meeting that would've included John Eastman. Does that  
13 jog your memory about the meeting?

14 A In the days leading up to January 6th, I recall John Eastman attending at least  
15 one meeting in the Oval.

16 Q Okay. And what do you remember about the one meeting that you -- or at  
17 least one meeting? What's the one meeting that you recall?

18 A The Vice President was also, at least in part, attending. I recall the meeting  
19 breaking up and the Vice President and his staff leaving at the same time John Eastman  
20 left.

21 Q Okay.

22 How did President Trump come to know John Eastman?

23 A I don't recall how they were introduced.

24 Q When did you -- when did John Eastman first come to your attention or  
25 knowledge?

1           A     I don't recall a specific introduction, but around this time, in the months and  
2 weeks after the election.

3           Q     Okay. And what was your understanding of what role or  
4 responsibility -- what was the -- or let me rephrase. In what capacity was Mr. Eastman  
5 introduced to you?

6           A     I knew his title was "Professor." I don't recall what institution he was part  
7 of. I was generally aware he had to do with election information.

8           Q     Okay. Did you know him to be a lawyer?

9           A     I knew his title only as "Professor."

10          Q     Okay. Do you have any, you know, recollection of who else knew  
11 Mr. Eastman or was working with him during this time period?

12          A     It was my understanding that he was familiar with Rudy.

13          Q     Okay. Is Rudy the individual that introduced you to John Eastman, or can  
14 you not remember?

15          A     I don't recall.

16          Q     Okay. Did you ever see Rudy -- Mr. Giuliani and Professor Eastman  
17 together in meetings at the White House?

18          A     My general recollection is they were together for meetings at the same time.

19          Q     Okay. And who were those meetings with at the White House?

20          A     Generally, I mean, the President in the Oval. I didn't make a note,  
21 especially written down, of who these people were coming in and out. Many of them  
22 were unknown to me.

23          Q     Okay. About how many times do you recall Mr. Giuliani and Professor  
24 Eastman meeting with the President in the Oval Office?

25          A     I recall them together just briefly. Separately, I recall Rudy being in more

1 meetings than John Eastman was.

2 Q Okay. And around which time period do you recall them meeting with the  
3 President?

4 A Rudy Giuliani met with the President regularly after the election; and  
5 John Eastman, more limited, in my recollection.

6 Q Okay.

7 What about phone calls? Were you involved in connecting phone calls in either  
8 direction between the President and Professor Eastman, meaning incoming and outgoing  
9 calls?

10 A I generally recall John Eastman being a caller and a call I placed.

11 Q Okay. And generally what timeframe was that in?

12 A Later in the period you're looking at. I don't recall exactly when he was  
13 introduced and how early that might've been.

14 Q Okay. What were the -- what was the purpose or what were the purposes  
15 of Professor Eastman's calls with the President?

16 A I was not part of those conversations.

17 Q Even if you weren't part of the conversation, in the context of connecting the  
18 call, did either the President or Professor Eastman give you an indication of what the  
19 subject matter was that they were hoping to speak to each other about?

20 A I don't recall being specifically told a topic.

21 Q Okay. Just generally, do you have a sense of the reasons for these calls?

22 A I generally understood Professor Eastman to be involved in election  
23 information.

24 Q I'm sorry. Did you say "election information"?

25 A Yes.

1           Q    Okay. What do you mean by "election information"?

2           A    He was interested in the election, and that was the information he was  
3 speaking about.

4           Q    Okay.

5           So, returning to the meeting that we started to discuss that I think you do  
6 recall -- and it has been widely reported that there was a meeting between the President,  
7 the Vice President, Professor Eastman, and then Marc Short and Greg Jacob from the Vice  
8 President's staff on January 4th -- was that meeting prearranged?

9           A    It's my recollection that the meeting was planned for the President and that  
10 the Vice President and his staff had been asked to join the meeting.

11          Q    Okay. Who set up the meeting?

12          A    I don't recall who set up that meeting.

13          Q    That was sort of a poorly phrased question. My question was really more,  
14 who asked for it? How did the meeting -- from where did it originate?

15          A    The vast majority of meetings, I didn't know where they originated. I saw  
16 them printed or listed on his schedule. I didn't know the background of them.

17          Q    In --

18          A    I --

19          Q    -- this case, did you -- oh, sorry.

20          A    Oh, in this case, I don't recall knowing the background in this.

21          Q    Okay. And about how long did the meeting last?

22          A    I don't recall the length being very long or very short.

23          Q    Were you sitting at your desk in the Outer Oval during the meeting?

24          A    I believe I was.

25          Q    Could you hear any of the contents of the meeting?

1           A    Not that I recall.

2           Q    Okay.

3           Generally, did the President ask you to do anything, you know, either during the  
4 meeting or after it as a request for followup?

5           A    Generally speaking, when he would have meetings, I would be asked to add  
6 phone calls to meetings, you know, add this person via phone. I don't specifically recall  
7 that happening on this meeting, but that was -- you had asked generally.

8           Q    Sure. Thank you. Yeah, that was going to be my followup. Do you  
9 remember connecting anyone by phone into this meeting?

10          A    I don't recall specifically.

11          Q    Do you remember that there were additional participants planned for the  
12 meeting and that was changed at any point?

13          A    I don't recall.

14          Q    We've heard from other witnesses that at least Mr. Giuliani and potentially  
15 other members of his legal team had been contemplated as participants in this meeting  
16 and that that changed. Do you remember that?

17          A    I don't recall that. It wouldn't be unusual for Rudy to attend a meeting at  
18 that time.

19          Q    Okay. Did the Vice President or his staff specifically ask for Mr. Giuliani or  
20 other people not to attend this meeting?

21          A    I don't recall.

22          Q    Okay.

23          Were there any documents prepared for this meeting?

24          A    I don't recall.

25          Q    Do you remember, did anybody ask you to print anything either before or

1 during this meeting?

2 A I don't recall.

3 Q Did Mr. Eastman come prepared with any documents for this meeting?

4 A I don't recall.

5 Q Okay.

6 Did you see the Vice President and his staff when they left the meeting?

7 A In that I was sitting at my desk and I remember them leaving.

8 Q Did you interact with any of them, have any conversations as they left the  
9 meeting?

10 A I don't recall.

11 Q Okay. What generally do you remember about their demeanor?

12 A I don't recall.

13 Q What about the President, his demeanor following the meeting?

14 A I don't recall.

15 Q And Professor Eastman?

16 A I don't recall his leaving, other than I thought he left with the -- when -- or  
17 about the same time the Vice President left.

18 Q Okay.

19 Did Professor Eastman have other meetings or calls with the President that day,  
20 on January 4th?

21 A I don't recall.

22 Q Okay. Do you recall seeing him in the White House at any other points on  
23 January 4th?

24 A Not that I recall.

25 Q Okay.

1 [REDACTED] Anything?

2 [REDACTED] Yeah.

3 BY [REDACTED]

4 Q Can I just go back to the "just the messenger" email? So, Ms. Michael,  
5 we're -- we can either pull it up or -- it's really not that necessary to see it.

6 When I read "just the messenger," that suggests that you're expecting the person  
7 receiving the email to somehow be unhappy, or that it's not a positive message, it's a  
8 negative message, and you're distancing yourself from it. That's my, sort of, common  
9 understanding of "just the messenger."

10 Is that accurate with respect to this email and your intent when you sent it?

11 A No. I don't recall forming an opinion about what I was sharing, other than I  
12 was sharing it, and I didn't know anything about it.

13 Q We've gone through a whole bunch of emails that you forwarded with no  
14 message, no parenthetical, nothing other than "FYI." Here, you said, "Just the  
15 messenger." And, again, to me, that's you're not vouching for the content, you're  
16 just -- you're "just," right? -- only the messenger.

17 And I'm just, again, trying to understand why you added that language when you  
18 sent that along to Marc Short.

19 A I don't recall.

20 Q Okay.

21 At this time -- this was sent very early morning on January 6th -- were you aware  
22 that there was a very direct conflict between the President and the Vice President about  
23 the Vice President's authority at the joint session of Congress that was to take place that  
24 day?

25 A It's difficult for me to separate what has been widely reported in the media

1 much later and what I recall being aware of at the time.

2 Q Yeah, I appreciate that, and that's an important distinction.

3 I'm just trying to get a sense as to -- you sat right outside of his office. And he  
4 was in, by all reports and, frankly, directly reported by other witnesses, a very  
5 acrimonious series of interactions with his Vice President. And I'm wondering if you  
6 were aware of that at the time.

7 A Well, I was not there on January 6th until the late afternoon. So I don't  
8 know what you're referencing, but I have no knowledge of that morning or --

9 Q My question is --

10 A -- afternoon.

11 Q Sorry. Go ahead.

12 A I finished.

13 Q Yeah, my question's not limited to January 6th. I'm wondering if you, as  
14 the President's executive assistant, sitting just feet away from the door to the Oval Office,  
15 were aware at any time of a very serious, acrimonious conflict between him and Vice  
16 President Pence.

17 A Two things. The door was often closed. I don't recall specifically the door  
18 being closed here, but the door was not always open.

19 And, second, there was often loud, heated conversations throughout the time I  
20 sat there. I didn't separate this as a unique time or anything other than the usual  
21 colorful way of communicating.

22 Q Yeah, Ms. Michael, I'm really not focusing on any particular meeting, any  
23 particular -- the one [REDACTED] asked you about.

24 I'm asking you generally if you were aware, around this time, of the President and  
25 the Vice President having a sharp disagreement over anything.

1           A    I don't recall.

2           Q    You don't recall the Vice President and the President having any kind of  
3         disagreement about anything over the election?

4           A    Not at this time, I don't recall.

5           Q    Do you remember them ever having a sharp disagreement about anything,  
6         not just limited to this time?

7           A    They spoke frequently, and they had different opinions frequently. To the  
8         extent the door is closed and I'm overhearing things, it's hard to form an opinion about  
9         something.

10          Q    No, I understand. Again, Ms. Michael, I'm not -- I'm asking you about a  
11         broad perception you had, not about any particular meeting. I want to be clear.

12          There's been lots of evidence we've developed about the President and the Vice  
13         President having angry words, having a sharp disagreement, having a fundamental  
14         difference of opinion about a crucial issue, the Vice President's ability to do certain things  
15         at the joint session, that spilled out in multiple conversations and publicly.

16          And I'm wondering if you, in your position, sitting right outside of the Oval Office,  
17         were aware of that conflict at any time.

18          A    Respectfully, I answered the phones. I don't recall what you're describing.

19          Q    Well, going back to "just the messenger," right, again, "just the messenger,"  
20         sent early on the morning of January 6th, suggests that you knew that Marc Short was not  
21         going to be pleased with -- or this would exacerbate a conflict. And that's -- I keep  
22         focusing you on that because it's an indication, perhaps, of your awareness.

23          So, again, were you aware when you sent this message that it would be poorly  
24         received by Mr. Short or the Vice President?

25          A    I don't recall.

1           Q     So, to be clear, your testimony is you have no personal recollection of a  
2 conflict between the President and the Vice President over the election?

3           A     I don't recall a conflict that you're describing.

4           Q     Well, do you recall any conflict?

5           A     Like I said, the President had all kinds of conversations, all kinds of time with  
6 the Vice President over the course of this -- the time that I witnessed it. I can't say they  
7 always agreed. I have no knowledge of these specific conversations.

8           Q     Did you ever hear the President say anything about the Vice President's  
9 authority about what he could or couldn't do at the joint session of Congress on  
10 January 6th, either to you or to other people?

11          A     Not that I recall.

12          Q     Did you ever hear him just speak disparagingly about the Vice President,  
13 criticize him?

14          A     I don't recall specifically.

15          Q     We've had testimony from other witnesses that he called him a wimp or said  
16 he wasn't the man he thought he was when he appointed him or picked him years ago.  
17 Do you remember him saying anything like that in your presence?

18          A     I don't recall.

19          Q     Would you recall, Ms. Michael, if he had said something like that in your  
20 presence about his own Vice President?

21          A     I don't recall ever attending a meeting inside the Oval Office, anything that --

22          Q     I understand that. This is not limited to a meeting in the Oval Office. This  
23 is any time you hearing him use those words.

24          A     I don't recall those words.

25          Q     Would you recall those words if they were said in your presence, something

1 like that about the Vice President?

2 A That's a really hard question to answer. This is a busy time. Lots of things  
3 were happening. I was receiving lots of emails. I don't know if I would've recalled that  
4 or not.

5 Q Well, it would seem significant if the President is speaking about his Vice  
6 President in that way, significant enough that perhaps those that worked with those men  
7 would recall. And you're saying, again, you're not sure you would recall if that was  
8 spoken, those words?

9 A The President said a lot of things about a lot of people that I don't recall in  
10 an exact way.

11 Q Right. Again, about the Vice President. Do you ever remember him  
12 speaking ill of the Vice President?

13 A Again, there has been a lot of media reporting, and it's hard to separate  
14 what I recall from this time and what I've later read.

15 Q Yeah. I don't want you to tell me what you've read; I want you to tell me  
16 what you remember.

17 Do you ever remember him saying, either to you or to other people in your  
18 presence, something disparaging, negative, critical of Vice President Pence?

19 A Not that I can specifically recall.

20 Q Okay. Thank you.

21 BY [REDACTED]

22 Q Okay.

23 Ms. Michael, do you remember, after the meeting that we were discussing that  
24 took place on January 4th between the Vice President, his staff, the President, and  
25 Professor Eastman, do you remember that the President came out to the Outer Oval

1       Office and asked any of your colleagues to do anything following the meeting?

2           A    That was typical, for him to come to the Outer Oval. I have no knowledge  
3       or memory of, after that meeting, him doing that.

4           Q    Okay.

5           After that meeting with Professor Eastman or any other meeting with  
6       Professor Eastman, did the President ever come out of the Oval Office and ask you to set  
7       up a phone call between the Vice President and Professor Eastman?

8           A    Not that I recall.

9           Q    Okay. Were you asked at any point to set up a phone call between the Vice  
10      President and Professor Eastman?

11          A    I don't specifically recall that, but I have no reason to doubt that's something  
12      I could've done. That would be a request in general. He asked me to set up phone  
13      calls throughout the time I worked there.

14          Q    Okay. Did you set up a phone call between the Vice President and  
15      Professor Eastman?

16          A    I don't recall.

17          Q    Okay.

18          Okay. I'd like to move forward to the -- we're still going to be talking about  
19      interactions with the Vice President and in some instances Professor Eastman, but now  
20      focused on January 5th.

21          We looked at some emails that you sent on January 5th, and we've talked about  
22      you being at work that day. I think you said you got there around 9:30 or 10:00. Is  
23      that right?

24          A    I don't recall what time I arrived on the 5th, but I generally got to work, on a  
25      normal day, between 9:00 and 10:00.

1           Q     Okay.

2           And I know you told us also about an instance where you were asked to come into  
3       the Oval Office to open the doors so that the President could hear the music coming in  
4       from outside. I believe you noted that when those doors were opened it was dark out,  
5       so my assumption is that that occurred, you know, in the evening. This was January, so  
6       at some point in the late afternoon, evening. Is that right?

7           A     That's how I recall it.

8           Q     Okay.

9           Were you at your desk for the duration of the day in between, you know, arriving  
10      to work and that Oval Office interaction in the evening, other than, of course, getting up  
11      to go to the bathroom and that kind of thing?

12          A     It was normal for me to be at my desk. I don't recall specifically anything  
13      different about January 5th in relation to where I was at my desk.

14          Q     Okay.

15          We have testimony and there has been some public reporting about interactions  
16      between the President and Vice President on the 5th. Do you remember -- what can  
17      you tell us about those?

18          A     I don't recall them -- I don't have a specific memory of them speaking.

19          Q     Okay.

20          We've heard from other witnesses that there was a meeting that took place in the  
21      Executive Office Building between members of the Vice President's staff and  
22      Professor Eastman. Did you have any role in arranging that meeting?

23          A     By "Executive Office Building," you mean which building?

24          Q     So I think it would've been the OEOB. But it would've taken place in either  
25      the office of Marc Short or of Greg Jacob.

1           A    I don't recall that meeting or coordinating that meeting.

2           Q    Okay.

3           We have evidence that there had been a planned lunch meeting between the Vice  
4 President and President on January 5th and that meeting was canceled. Is that right?

5           A    I don't recall that. Lunches -- it wasn't unusual for a lunch to be pulled  
6 down, from my experience.

7           Q    In this instance, do you remember who canceled the meeting? Was it the  
8 President, the Vice President, or somebody else?

9           A    I don't remember it being canceled nor who canceled it.

10          Q    Okay.

11          We also have evidence that there was a Coronavirus Task Force meeting planned  
12 for that afternoon that the Vice President was leading. Do you remember that taking  
13 place?

14          A    The Vice President, in my understanding, frequently had meetings like that.  
15 I don't recall, that day, anything in particular about that meeting.

16          Q    Okay. We've had testimony that the Vice President was delayed in  
17 beginning that meeting because he had been asked to come to the Oval Office to meet  
18 with the President. Is that right?

19          A    I don't recall that.

20          Q    Did the President ask you to arrange a meeting with the Vice President on  
21 the 5th?

22          A    I don't recall that on the 5th.

23          Q    Okay. Do you recall the Vice President coming to the Oval Office that day  
24 and meeting with the President?

25          A    I don't recall.

1           Q     I think that probably would've been around 2:00 or 2:30 in the afternoon.  
2     What else do you remember going on in the Oval Office or around it around that time in  
3     the afternoon?

4           A     January 5th, to me, was a day like I'd seen many times before. I don't have  
5     a specific memory other than the unusual nature of listening to the music that night.

6           Q     Okay. So the music coming in from the Ellipse was the only unusual thing  
7     about January 5th?

8           A     That's the only memory I have of that day.

9           Q     Okay. Was there anything else about the preparations for January 6th that  
10    would've made January 5th an unusual day in the White House?

11          A     I don't recall.

12          Q     Okay.

13          After that meeting with the Vice President -- between the President and the Vice  
14    President in the Oval Office, I had hoped to ask you if anyone else participated. But I  
15    think your testimony is that you don't remember seeing the Vice President meet with the  
16    President at all that day. Is that right?

17          A     I don't have a memory of that day. I don't know if they met or they didn't.

18          Q     Okay.

19          We have testimony from other witnesses that, after their meeting, the President  
20    called, tried to reach Vice President Pence on the phone. Did you place any calls for the  
21    President to the Vice President on January 5th?

22          A     Not that I recall.

23          Q     Okay. This would've been an instance in which the switchboard or perhaps  
24    yourself would've had trouble tracking down the Vice President, because I believe he  
25    wasn't in his office. He was either in the barber shop or then, later, in his chief of staff,

1        Marc Short's office at the Executive Office Building.

2              Does that jog your memory at all about placing a phone call between the  
3        President and Vice President on January 5th?

4              A     No.

5              Q     Okay.

6              We also have testimony from witnesses that there was at least one phone call in  
7        the afternoon between the President and Professor Eastman. Is that correct?

8              A     I don't recall that.

9              Q     Okay. So your testimony is that you don't recall having any knowledge or  
10       being involved in any way with setting up phone calls between the President and  
11       Professor Eastman on January 5th?

12              A     That is correct.

13              Q     Okay.

14              What about a phone call between the President and Greg Jacob, chief counsel to  
15       the Vice President? Were you involved and do you remember there being a phone call  
16       between the President and Greg Jacob?

17              A     I don't recall that phone call.

18              Q     Okay.

19              Do you recall any other calls that afternoon between the President and other  
20       lawyers?

21              A     Not that I recall.

22              Q     Is there an individual known to you named Kurt Olson?

23              A     I'm aware of that name. Yes.

24              Q     And who is he?

25              A     He is known to me as a lawyer that was new around the time after the

1 election.

2 Q What do you mean by "new"?

3 A I didn't know him before the election.

4 Q Okay. And what was your understanding of his role or responsibilities?

5 A I generally understood him to be interested in the election.

6 Q Did he speak to the President on January 5th?

7 A I don't specifically recall.

8 Q Okay.

9 In the evening, there was -- well, at some point during January 5th, there was  
10 some reporting by The New York Times specifically on the topic of the interactions  
11 between the President and Vice President concerning the joint session of Congress to  
12 certify the election.

13 Do you remember that?

14 A Your question was at the time there was reporting?

15 Q Yep.

16 A Okay.

17 Q The reporting was public on January 5th.

18 A Okay. I don't recall that reporting.

19 Q Okay. Do you remember discussing it? I know you mentioned earlier that  
20 Mr. Scavino is someone whose office was -- or his desk was quite close to yours in the  
21 Oval Office -- or the Outer Oval. Forgive me. Do you remember Mr. Scavino talking  
22 about this reporting?

23 A I don't recall.

24 Q Okay.

25 The President issued a statement on the evening of January 5th specifically

1       relating to the reporting by The New York Times and making certain statements about the  
2       power of the Vice President during the joint session planned for January 6th to certify the  
3       election.

4                  Do you remember that?

5                  A     I don't.

6                  Q     Okay. Who would've been responsible for issuing a statement like this?

7                  A     You're referring -- it was a tweet that went out?

8                  Q     I think it went out at least in part on Twitter, but it might've also, you know,  
9       been a little bit more formally released.

10                 A     Speaking generally, Dan Scavino and the President were the primary people  
11       involved in something that came from the President's Twitter account. If it was a  
12       different kind of statement, I'd have to understand that to explain where I thought it  
13       came from.

14                 Q     Okay.

15                 What about Jason Miller? Was Mr. Miller involved in, you know, statements like  
16       this from the President?

17                 A     I understood Jason as a campaign communications person. I don't know  
18       his role to be saying something from the White House.

19                 Q     Okay.

20                 We have testimony from other witnesses that the release of this statement was  
21       very upsetting to members of the Vice President's staff, who believed that the statement  
22       issued by the President was inaccurate.

23                  Do you remember that?

24                 A     I don't recall this.

25                 Q     Did you, you know, receive or send any emails or place any calls for the

1 President in the evening of January 5th related to this statement and the reaction from  
2 the Vice President's office?

3 A Not that I recall.

4 Q Okay. Did you discuss it at any point or help to facilitate any  
5 communications by the President with Jason Miller about this statement?

6 A I don't remember this statement.

7 Q Okay.

8 What about the evening of January 5th? Do you remember placing or, you  
9 know, coordinating any communications -- emails, phone calls, anything like that -- with  
10 Mr. Miller?

11 A I placed a lot of calls all throughout the period of a day. I don't recall  
12 specifically placing a call to one person, Jason Miller.

13 Q Okay.

14 What about directly with the Vice President's staff? Were you involved in any  
15 communications, either directly to you or through you to the President, with Marc Short  
16 or anyone else from the OVP?

17 A Again, I don't remember this statement.

18 Q Do you remember any communications on January 5th that you facilitated  
19 with members of the Vice President's staff?

20 A Not that I recall.

21 Q Okay.

22 [REDACTED] I'll just pause here to see if any of my colleagues have any questions?

23 [REDACTED] No, thanks.

24 [REDACTED] Okay.

25 BY [REDACTED]

1           Q     Okay. Let's talk about January 6th, Ms. Michael.

2           So, going into January 6th, what were your expectations for the day?

3           A     Well, [REDACTED]. I stayed home for the morning. I  
4     expected to go in in the afternoon [REDACTED]. [REDACTED], and I went  
5     into the office in the afternoon sometime, maybe 2:30, 3:00, something like that.

6           Q     Okay.

7           And we'll talk a little bit more about, sort of, the events of the day and what was  
8     happening by the time that you got into the office, but just putting your mind back to the  
9     beginning of the day or, you know, in the evening of the 5th, what did you understand the  
10   President's planned events or schedule for the 6th to include?

11          A     I understood the President to be making a speech on what's called the  
12   Ellipse, and then I understood that he may or may not come to the Oval. And that's  
13   generally what I thought the day would hold.

14          Q     Okay. What did you understand was occurring in Congress that day?

15          A     I was not aware of the specifics, the proceedings. I had never known -- I  
16   think they were covered more than they've ever been covered. I generally knew that  
17   this was election-related and the Vice President was participating.

18          Q     How did you know -- or how did you come to form your understanding that  
19   the Vice President was participating?

20          A     As my role as an executive assistant to the President, I was generally aware  
21   of the Vice President's role -- or, excuse me, the Vice President's schedule. I would  
22   speak with the Vice President's executive assistant.

23          Q     Who is that individual, the Vice President's executive assistant?

24          A     Her first name was Sarah.

25          Q     Okay. Did you speak with her about the Vice President's schedule for

1       January 6th?

2           A     Not that I specifically recall.

3           Q     Okay. How did you -- what was your understanding of the Vice President's  
4     schedule, activities planned for January 6th?

5           A     I recall knowing he would be at the Capitol in the morning or afternoon. I  
6     don't know if I knew what time.

7           Q     Okay. And did you know for what purpose he would be at the Capitol?

8           A     I knew it related to the election.

9           Q     Okay. Related to the election in what way?

10          A     In that it was a proceeding in Congress.

11          Q     Okay. And what was your understanding of what the Vice President was to  
12     do for this proceeding in Congress?

13          A     I don't recall knowing what his role was.

14          Q     Do you remember a discussion within the White House about what his role  
15     was?

16          A     I don't recall.

17          Q     Okay.

18          Did you talk -- in addition to the Vice President's executive assistant, Sarah, did  
19     you talk to any other members of the Vice President's staff about the proceedings on  
20     January 6th?

21          A     I don't recall specifically speaking with Sarah, but, on some level, the Vice  
22     President's schedule was known to me, just because it was a schedule that was produced  
23     by the scheduling team. So I didn't have a specific conversation about his schedule that  
24     day. I was aware he was going to be at the Capitol.

25          Q     Okay.

1           Did President Trump express to you what his expectations were for the  
2   proceedings in Congress on January 6th?

3           A   Not that I recall.

4           Q   Okay. Did he at any point give you a sense of whether this was an  
5   important day?

6           A   I don't recall.

7           Q   I believe you said earlier when you were giving us your sense of what the  
8   President's schedule was expected to be on the 6th that he may or may not come to the  
9   Oval Office.

10          Tell us what you meant by that. Why was there some question about whether or  
11   not he would be in the Oval Office?

12          A   I don't recall there being scheduled meetings in the Oval. Some days  
13   where there were events or speeches, he would return and go to the residence.

14          Q   Okay. Was there any discussion about the President going somewhere else  
15   other than either the Oval Office or the residence that day?

16          A   I don't recall discussions like that.

17          Q   Were you at any point, whether it was, you know, in the immediate, you  
18   know, days or hours preceding January 6th or at any other time, involved in  
19   communications about the possibility that the President would go to the Capitol on  
20   January 6th?

21          A   I didn't know -- I don't recall that being a potential.

22          Q   Okay.

23          Do you remember -- well, let me just rephrase. Like, how did the President's  
24   speech on the Ellipse and the rally that he was speaking to, how did that come to be?

25          A   What do you mean by "come to be"?

1           Q   Who planned it? How did it get planned?

2           A   I'm not aware of the planners or the background of that event.

3           Q   How did you first come to know that there would be a rally and a speech on  
4   the Ellipse that day?

5           A   At some point in the week -- I'm not quite sure how far before the 6th -- it  
6   became known to me through the President's schedule that was a week or two out that  
7   that was an event that he would be speaking at.

8           Q   Okay. Did you ask any questions of anyone about what the context was or  
9   what the parameters were for this event?

10          A   I don't recall.

11          Q   Okay. Do you recall any discussions, either with the President or other  
12   members of White House staff, about the size of the rally, the expectation for how many  
13   people would attend?

14          A   No.

15          Q   Did you ever hear anything, either from the President or other White House  
16   staff, about whether attendees at the rally would march to the Capitol?

17          A   I don't recall that.

18          Q   Okay. Did you hear anything in the White House about any concerns about  
19   the potential for violence on January 6th?

20          A   I don't recall.

21          Q   Do you know how it was decided who would speak at the rally on  
22   January 6th?

23          A   It was my understanding that people involved in the event were generally in  
24   charge of the logistics and things on the -- about the event.

25          Q   Okay. And who were the people involved that you're referring to there?

1           A     It was my understanding the event was put on by some sort of outside  
2     group. And when the President -- when it was on his schedule to attend, then another  
3     office in the White House would become involved, as they do for all events, and that's the  
4     Advance Office.

5           And it was my understanding that Max Miller, as the -- I believe his title was  
6     "Director of Advance" -- was involved in the event from the President's perspective.

7           Q     Okay. Did you have any discussions with Mr. Max Miller about the rally and  
8     the President's speech?

9           A     I remember one exchange on the morning of the 6th where I informed  
10    Max Miller and the chief of staff that John Eastman would be part of the speakers, and I  
11    shared that with Max and Mark.

12          Q     Do you remember just approximately when you had that conversation with  
13    Max and Mark?

14          A     It was sometime in the morning. Not really early in the morning.

15          Q     Okay. Did you call them or email them, text message them?

16          A     I emailed them.

17          Q     Okay. And how did you come to be aware of the information you were  
18    conveying about Professor Eastman being a part of the speakers?

19          A     I believe I got a phone call from Rudy, who shared with me that  
20    John Eastman should be part of the speakers.

21          Q     Okay. What else did he tell you?

22          A     I don't recall that phone call being long or anything more specific.

23          Q     Did he say that it was his own, Mr. Giuliani's wish that Eastman should  
24    speak, or was he conveying anyone else's wishes there?

25          A     I believe he was conveying that he had spoken to the President and that was

1       a result of that conversation.

2           Q    Okay. Why did the President want Professor Eastman to speak?

3           A    I don't recall.

4           Q    Okay. But it's your understanding that, until Mr. Giuliani reached out  
5       through you to the organizers, that Mr. Eastman was otherwise not planned to be a  
6       speaker. Is that right?

7           A    I can assume that. I don't recall seeing any speaker lineup prior to that.

1 [2:44 p.m.]

2 BY [REDACTED]

3 Q Okay. Did you receive phone calls from anyone else that day relating to the  
4 rally and the speakers?

5 A That is the only phone call I recall.

6 Q Okay. Did you meet at any point with Katrina Pierson about the speakers  
7 for this rally?

8 A I did not meet with Katrina, no.

9 Q Are you aware of meetings between the President and Ms. Pierson about  
10 speakers at the rally?

11 A I recall -- I don't know what day -- sometime before the 6th -- that Katrina  
12 had a scheduled meeting with the President.

13 Q We have some evidence indicating that that would have occurred on January  
14 4th. Does that sound right to you?

15 A It was in one of the days immediately preceding the 6th.

16 Q Okay. What else can you tell us about the meeting between the President  
17 and Ms. Pierson?

18 A I recall that meeting happening in the dining room. I recall Max Miller also  
19 being part of that meeting.

20 Q Anyone else?

21 A I don't recall.

22 Q Did the President ask you to make any calls, set up any other meetings, do  
23 any other followup after that?

24 A I don't recall.

25 Q Okay. Did you overhear any portion of that meeting?

1 A No.

2 [REDACTED] Okay. I'll pause here just to see if anyone has any followups.

3 BY [REDACTED]

4 Q Do you recall, or did you ever come to have an understanding as to why or  
5 how Ms. Pierson got involved with the January 6th rally?

6 A I don't recall knowing the origin or why she was involved.

7 Q Do you recall ever hearing disagreements about who should speak at the  
8 rally on January 6th?

9 A That meeting and others that happened in the dining room, I have -- they  
10 were very far away from my desk. I don't recall anything from that meeting.

11 Q And, you know, I'm not specifically asking whether you heard via, you know,  
12 eavesdropping or whatnot, but just otherwise you working at the White House, did you  
13 ever come to hear that there were disagreements as to who should be speaking at the  
14 Ellipse on January 6th during the rally?

15 A I don't recall disagreements.

16 Q Do you ever recall hearing the name Ali Alexander coming up as a potential  
17 speaker or otherwise attendee in connection with the January 6th rally?

18 A I don't recall.

19 Q Do you recall ever hearing that President Trump made changes to the  
20 speakers list for the January 6th rally?

21 A I don't recall specifically.

22 Q Do you recall generally that he made -- might have made changes to the  
23 speakers list for the January 6th rally?

24 A It's not unusual for a rally, many that the President had, for him to be  
25 involved in speakers. So I don't recall changing speakers for this specific rally.

1           Q     So you don't recall ever hearing that President Trump made any changes for  
2     the speakers list for the January 6th rally?

3           A     I don't recall hearing that, but that was not an unusual thing to know.

4                         BY [REDACTED]

5           Q     So, Ms. Michael, you told us that you were essentially, you know, [REDACTED]  
6     [REDACTED] on the morning of January 6th. You've also told us that you received  
7     and conveyed information through Mr. Giuliani.

8                         Were you still working from home that morning, or were you, you know, really  
9     [REDACTED]?

10          A     I recall being on my phone like I would, you know, if I wasn't home.

11          Q     Okay. And who was in the -- sort of on duty at the -- in the outer Oval that  
12     day in the morning in your absence?

13          A     I wasn't aware that he was going to come to the Oval. I recall knowing that  
14     Nick Luna would be with him as he took the motorcade to the Ellipse and back.

15          Q     Okay. And then was Mr. Luna in the outer Oval when, in fact, the President  
16     did come into the office?

17          A     That's my recollection.

18          Q     Okay. Were you in touch with him and/or Mr. Ferrer that day?

19          A     As the texts that I shared through my lawyer, one indicates that I was in  
20     touch with Nick that morning.

21          Q     Okay. We'll have a chance to talk about those in just a couple of minutes,  
22     but setting aside your text messages, do you remember when you were at home on  
23     January 6th being in touch with Mr. Luna and/or Mr. Ferrer?

24          A     Not beyond the texts, I don't have a memory of speaking with them.

25          Q     Okay. Well, during the portion of the 6th when you were at home, were

1       you aware or involved in any phone calls that the President may have made?

2           A     I don't recall connecting phone calls from home that morning. If he took  
3       phone calls, it would have been from the office.

4           Q     Okay. Let's look at exhibit 15, please.

5           So, Ms. Michael, this is a document from the Archives. It says "the daily diary of  
6       President Donald J. Trump" at the top. This is -- in general terms, we talked a little bit  
7       earlier this morning about the preparation of these or these types of documents during  
8       the -- your time in the White House.

9           This is the daily diary from January 6th. It starts with a phone call at 8:23 a.m.,  
10      where the President reached out to the White House switchboard operator to place a call  
11      to Dan Scavino.

12          Why don't you go ahead and take a look at the first few lines there, if you can see  
13      them. It includes this call with Mr. Scavino, a call with Mr. Olson, a call with  
14      Mr. Bannon, and a call with Mr. Giuliani, all before 9 a.m.

15          Were you involved in coordinating or involved in any way in these calls that the  
16      President made that morning?

17           A     No.

18           Q     At 8:56 and then 9:02, it reflects that the President reached out to the White  
19      House switchboard to place calls first to Mark Meadows and to the Vice President. Then  
20      there's -- the next line reflects that the President did talk with the Chief of Staff Mark  
21      Meadows at 9:03 a.m.

22          Do you know anything about this call?

23           A     I don't.

24           Q     Do you know why the President was looking to speak with Mr. Meadows  
25      that morning?

1           A    I don't.

2           Q    Okay. There's -- the next line reflects that the President again heard back  
3         from the White House switchboard operator, who informed him that a message was left  
4         for the Vice President. So that's 9:15, following up on the President's request to speak  
5         to the Vice President at 9:02.

6           Mr. Benson. Excuse me. We can't see that part of the exhibit.

7           [REDACTED] Oh, sure. We can scroll down a little bit so it's a little bit more  
8         clear. There you go.

9           Now, it's the third line from the bottom. "Left a message for the Vice President."

10          Mr. Benson. The subtitles are covering up -- cover up at the bottom. So, if you  
11         could scroll further up, that would be helpful, I think.

12          [REDACTED] Sure. We don't see it on our end. We don't see any subtitles on  
13         our end, but --

14          Mr. Benson. We have subtitles for some reason.

15          [REDACTED] Yeah, no problem.

16          BY [REDACTED]

17          Q    There we go. Does that help?

18          A    Yes. We can see as far as the 9:24 call now.

19          Q    Okay, great. Yes, so these ones I was directing your attention to were 9:02  
20         and 9:15. Do you know, did the President speak to the Vice President that morning?

21          A    I don't know if he spoke.

22          Q    In your experience as the President's executive assistant in the White House,  
23         was it, you know -- how -- how long did it usually take for the White House switchboard  
24         to be able to reach the Vice President and for him to return a phone call to the President?

25          A    I have never thought about that. There were times that phone calls from

1 anybody, it took a while. I don't know if I have a normal return call in mind, or the time  
2 that that would take.

3 Q Okay. Yeah, I was just curious whether you thought that it was unusual for  
4 the President to reach out to -- you know, to request a phone call for the Vice President  
5 and just to leave a message and not to get a return call back.

6 A That was not something unusual that I saw.

7 Q Okay. I was going to ask you a few more questions about these calls that  
8 the President made in the morning of January 6th, but before going through this in detail,  
9 let me just ask you, were you involved or aware of any of the phone calls placed by the  
10 President or received by the President that morning?

11 A Insofar as the White House operators would share emails when a call was  
12 connected or when a message was left, that's how they operated when he was in the  
13 residence. And I would get an email, among other people. I don't recall monitoring  
14 those emails that morning in any particular way.

15 Q Okay. And the -- this daily diary that's prepared, is it your understanding  
16 that the calls that are reflected here that were placed through the White House  
17 switchboard, would that information have come through you or one of your colleagues in  
18 the outer Oval to the diarist, or would it have been directly from the White House  
19 switchboard?

20 A Frankly, this is a document I don't recall ever seeing this kind of formatting  
21 before. It appears as if the email that came from the operator was relayed or  
22 transcribed into a document like this, but this is not a format I recall seeing.

23 Q Okay. The email notifications that you just described to us that you would  
24 receive from the White House switchboard, were those automatically, you know,  
25 incorporated into the daily diary, the diarist's work, or did you have any role in providing

1       that information?

2           A     I didn't know that the diarist incorporated those calls.

3           Q     Okay. This document reflects a phone call being placed at 11:17 that  
4     morning. Do you have any reason to know or understand who the President spoke to  
5     that morning at 11:17?

6           A     No, I don't know.

7           Q     Okay. There's also, just before this entry --

8           Sorry, Grant, I'm going to make you go backwards. If you scroll up a little bit.  
9           There's a meeting in the Oval Office. It says 11:08, the President went to the  
10     Oval Office; and then, 11:11 a.m., the President met with, and then there's a list of  
11     several individuals, including members of his family and Stephen Miller, assistant to the  
12     President, senior adviser for policy.

13           Do you know anything about this meeting?

14           A     I don't.

15           Q     I know you've testified that you were not at work at this time. You were at  
16     home.

17           Did you later have any conversations with anyone about the President's meetings  
18     in the Oval Office before going to his speech?

19           A     Not that I recall.

20           Q     Anything else?

21           Okay. Let's look at exhibit -- I actually have one question, one more quick  
22     question I wanted to ask you, exhibit 17. This is a document that just says "private" at  
23     the top. It includes some portion of the events of the day.

24           I'm wondering if this format of this document is familiar to you?

25           A     The format of this document is consistent with the formatting of schedules

1 that would be sent to me.

2 Q Okay. And you said earlier in your testimony that there was a team of -- a  
3 scheduling team that would prepare this document?

4 A Yes. I believe I received schedules like this from an email that said  
5 Presidential scheduling or something like that.

6 Q Okay. This one has some handwriting at the top. There we go. Can you  
7 see that? It's in blue ink.

8 A Yes.

9 Q And it has some notations about, you know, additional scheduling items,  
10 including what appears to be the meeting with family members that we talked about a  
11 moment ago as well as two calls, it looks like.

12 A I see that.

13 Q Yeah. Seeing here writing on this document, is this -- do you know -- first  
14 of all, do you know whose handwriting that is, who wrote these notes?

15 A That looks like what I know Austin's handwriting to be.

16 Q Okay. And is this something that Austin or yourself and your colleagues in  
17 the outer Oval would do to keep track of the President's calls and meetings during the  
18 day?

19 A When possible.

20 Q Okay. How would you or Mr. Ferrer have -- what would be the basis of the  
21 information that would be added to the schedule in this handwritten format?

22 A When, like I said, things didn't start on time or when meeting participants  
23 were additional to what was listed or when a phone call came in that was not scheduled.

24 Q Okay. Let's look at exhibit 18, please. Earlier today, Ms. Michael, you said  
25 that you would receive, you know, the prepared text of the President's speeches. This

1 appears to be the remarks that the President made at the Ellipse on January 6th.

2 I'm wondering if you remember receiving this document specifically?

3 A I don't specifically remember receiving that.

4 Q Is the format of the document familiar to you from your experience, as you  
5 told us earlier, in receiving, you know, advance prepared copies of the President's  
6 speeches?

7 A Insofar as that looks like the font and the format, yes.

8 Q Okay. And what does the red text indicate? You can see in the end of the  
9 second paragraph, there's an example of some text in red.

10 A I understood that to be a function of the editing process.

11 Q Okay. Would that have indicated language that was added or changed?

12 A That would indicate something new. That's something that a previous  
13 draft might not have had.

14 Q Okay. Would that have -- would these have been edits made by the  
15 President?

16 A Not necessarily. It could be edits from him or anyone else, but they were  
17 just marked as a new addition.

18 Q Okay. Do you know who -- who drafted or who wrote the speech for the  
19 rally at the Ellipse?

20 A No, I don't know specifically.

21 Q Just generally, who would have been on the team responsible for writing a  
22 speech like this?

23 A There was a large team of writers and editors. Those known to me were  
24 Stephen Miller, Vince Haley, and Ross Worthington.

25 Q And do you have any specific knowledge about who was involved in

1 preparing the January 6th remarks?

2 A No.

3 Q Do you know why the President wanted to give remarks on January 6th?

4 A I don't recall.

5 Q Did the President or any members of the speech writing team ever tell you  
6 what the President wanted to say in the speech?

7 A I don't recall.

8 Q Who would be responsible for actually making changes like the ones that are  
9 reflected in red here?

10 A It depended. It could be one of the people I listed or another member of  
11 their team I didn't really work with. Sometimes the Office of Staff Secretary was  
12 involved in speech changes and putting those in the teleprompter or fixing them for the  
13 final draft.

14 Q Okay. Were you or your colleagues in the outer Oval ever responsible for  
15 making changes, at the President's request?

16 A On occasion, members of the speechwriting team would work out of our  
17 office. I recall several times where my computer was used to make edits. I don't recall  
18 making my own edits to a speech at any time.

19 Q Okay. You've told us that you were at home this day. Did you watch the  
20 President's speech?

21 A I watched it on television.

22 Q Okay. There were some specific lines that are reflected in the video, you  
23 know, taped version of the President's remarks that are not reflected in this document,  
24 the prepared draft of the speech.

25 Would it be a fair conclusion to say that the President had added those additional

1       lines?

2           A    I'm not sure. He would speak off the cuff and impromptu. Ad lib is  
3       normal.

4           Q    Okay. Let's look at exhibit 19, please.

5           These are some text messages that we received from another source. I believe  
6       they're text messages exchanged between you and Nick Luna. Is that correct?

7           A    That is correct.

8           Q    Okay. And are you the one who was, you know, writing the text that's in  
9       the blue boxes here?

10          A    Yes.

11          Q    Okay. It starts on January 6, 2021, at 12:27 p.m., which I believe would  
12       have been during the President's remarks. And you write: Is he really going to the  
13       Capitol -- question mark.

14          Do you remember sending that message to Mr. Luna?

15          A    I remember hearing the President say something to the effect that might  
16       indicate he would, and that was new information to me. I hadn't heard that. I  
17       remember wondering -- questioning if that was true.

18          Q    Okay. And you heard it, you mean in his remarks that he was delivering  
19       that you were watching live, presumably, at the rally?

20          A    Yes. His live rally is the first time I heard that.

21          Q    Okay. So it had -- and what was your reaction to the concept of the  
22       President going to the Capitol?

23          A    I believe my reaction was that changes my coming into the office if he's not  
24       going to be there.

25          Q    Okay. Did you have any other concerns about the President going to the

1 Capitol?

2 A The President's movements were not my concern.

3 Q Not your concern. What do you mean by that?

4 A As in the Advance Office and Secret Service and a variety of other offices  
5 handled a movement of the President. I had nothing to do with his movements like  
6 that.

7 Q Okay. Mr. Luna responds: LOL he's not.

8 And then that's, you know, maybe almost 15 minutes after your original text  
9 message.

10 Did you do anything in between, you know, sending that text when  
11 you -- presumably right around when you heard the President say that he was going to  
12 the Capitol and before hearing back from Mr. Luna? Did you reach out to anyone else?

13 A I don't recall.

14 Q Okay. And then you ask, you know, did he come back to the Oval around  
15 1:23, and Mr. Luna responds yes, in the affirmative.

16 You then say that you're -- it looks like you say you're going to come in, and then  
17 report at about 2:04 that you're en route.

18 If we can just scroll down a little bit so she can see that part.

19 A I see that.

20 Q Okay. Mr. Luna responds: Okay! It's a miserable place but you're more  
21 than welcome to join the party -- exclamation point.

22 What did you understand him to mean when he said "it's a miserable place"?

23 A I don't recall following up or having a conversation with him before arriving  
24 to understand what that meant.

25 Q What did you think when you got the text?

1           A    I don't remember forming an opinion.

2           Q    Was it unusual for Mr. Luna to describe either the White House or the Oval  
3         Office as a miserable place?

4           A    I don't recall him you using that word before, but generally, we worked very  
5         long hours, and that can be miserable.

6           Q    Understood. Was he referring to anything in particular on January 6th, do  
7         you think?

8           A    At that time, I wasn't aware.

9           Q    Okay. And then he says: You should be okay as well -- the crowd moved  
10        to Capitol.

11          What did you understand him to mean when you got that message around 2:06  
12        p.m.?

13          Mr. Benson. Can you please -- pardon me. Can you please scroll down?

14          [REDACTED] Sure.

15          Mr. Benson. Thank you.

16          [REDACTED] Does that help?

17          Mr. Benson. Yes.

18          [REDACTED] Okay.

19          The Witness. What was your question?

20          BY [REDACTED]

21          Q    The last message that's shown on this page, "you should be okay as  
22        well -- the crowd moved to Capitol," from Mr. Luna to yourself at 2:06 p.m., what did you  
23        understand him to mean by that?

24          A    I knew that he knew I was driving in on roads that were very close to the  
25        Ellipse and that it's difficult to drive when there's crowds like that in that close proximity.

1           Q    Okay. So was there -- was he expressing some concern for your safety?

2           A    I think he was expressing traffic concerns and driving through crowds.

3           Q    Okay. And, at 2:06 p.m., when you received the text message, what was  
4       your understanding of what was happening at the Capitol?

5           A    After the President finished speaking, I don't recall being aware of any news  
6       or reporting until I got into the White House.

7           Q    Okay. And about what time did you get to the White House?

8           A    I don't know exactly, but approximately as early as 2:30 or as late as 3:30 by  
9       the time I got to my desk.

10          Q    Okay. And what accounts for that hour-long range? Where else might  
11       you have been after driving to work between, you know, getting out of your car and  
12       getting to your desk?

13          A    I don't recall there being traffic or not. It took me sometimes a little bit  
14       longer to get in. And then there's security, parking, and walking in took some time.

15          Q    Okay. Where was the President when you arrived at the White House?

16          A    He was in the dining room.

17          Q    Who was there with him?

18          A    I, being at my desk, wouldn't and didn't know who was in with him when I  
19       first arrived.

20          Q    Okay. When you first got to work, did you check in with the President to  
21       let him know that you were there?

22          A    I did not.

23          Q    Okay. When was the first time that you actually interacted with the  
24       President that day?

25          A    At some point in the afternoon, I don't recall specifically the time, he called

1 me on my phone.

2 Q Okay. What did he say when he called you that afternoon?

3 A He generally asked what I thought.

4 Q What you thought about what?

5 A I understood him to mean the coverage on TV, because I described what I  
6 was seeing on TV.

7 Q Okay. So did you have a TV near your desk in the outer Oval?

8 A Yes. The TV was sort of behind me, behind and over my shoulder.

9 Q Okay. Do you remember what was on the television when you got to work  
10 that day?

11 A When I got into work, the footage was already showing from outside the  
12 Capitol crowds breaking in.

13 Q Okay. So do you remember seeing people actually breaking into the  
14 Capitol Building itself when you first got to work?

15 A That was the first time that I knew that was happening, when I got into work.

16 Q Okay. When you got to your desk in the outer Oval, who else was there?

17 A I recall Nick Luna being there. I recall Dan Scavino being there. I recall  
18 others coming and going.

19 Q Okay. So, when you got to your desk and you see on the television that  
20 rioters are breaking into the Capitol, did you discuss that with Mr. Luna, Mr. Scavino, or  
21 any of the others that were in the outer Oval?

22 A I don't recall a specific conversation. I remember generally that there was  
23 distress, and I understood that was what miserable meant.

24 Q I see. Okay. So you were recalling the text message that Mr. Luna had  
25 sent to you at that point and thinking that the attack on the Capitol is what he was

1 referring to as miserable?

2 A The general distress over what was happening.

3 Q Okay. Did you ask anyone, when you first got to your desk and you saw  
4 what was going on on television, did you ask whether the President was aware?

5 A I don't recall asking that.

6 Q Did anybody share with you any information that would have helped you to  
7 understand whether the President was aware of what was going on?

8 A I don't recall.

9 Q Okay. You mentioned that there were some others coming and going from  
10 the outer Oval during the initial time period when you got to work. Who were those  
11 other individuals that you remember?

12 A I recall seeing Eric Herschmann, Mark Meadows. I recall seeing Ivanka.

13 Q Anyone else?

14 A I don't specifically recall beyond those people.

15 Q Okay. Did you speak with each of those people?

16 A I recall them just passing through my office on their way into the dining  
17 room.

18 Q Okay. So I think you said that President Trump called you and asked you  
19 what you thought. About how much time had lapsed between when you got to work  
20 and saw on the televisions that people were breaking into the Capitol and when the  
21 President called you?

22 A I don't recall the specific lapse of time. It was sometime after I arrived.

23 Q Okay. How about -- let's see. There's a few tweets that the President  
24 sent that afternoon after returning to the Oval Office and after his speech. The first one  
25 I'll draw your attention to is a tweet at 2:24 p.m. that relates to the Vice President. Do

1 you remember seeing that?

2 A Are you pulling it up on the screen?

3 Q I can, yeah. It's exhibit 20.

4 A At the time, I didn't have a Twitter account. If that was reported on the  
5 television, I may have seen it, or otherwise, but I was not generally monitoring Twitter  
6 with my own account.

7 Q Okay. I know you said that your desk was in close proximity to Mr. Scavino,  
8 who I understand was in charge of or involved in the President's Twitter account. Did  
9 you discuss this tweet with Mr. Scavino at any point during January 6th?

10 A I don't recall.

11 Q Okay. Do you know who was involved in preparing this tweet?

12 A I don't recall.

13 Q Okay. There have been --

14 [REDACTED] Do you have something?

15 [REDACTED] I was just going to go to the conversation with the President, but I  
16 assume you are as well.

17 [REDACTED] Yes.

18 [REDACTED] Okay.

19 BY [REDACTED]

20 Q Well, I was going to give you a couple of other publicly reported facts. It is  
21 my goal to see if that could help us pin down your conversation with the President.

22 Around 2:26 that afternoon, so right after this tweet was posted, the President  
23 had a phone call with Senator Tuberville. He had -- was seeking to speak with him and  
24 mistakenly placed the call to a number that was the phone of Senator Mike Lee.

25 Do you remember that?

1           A    I don't recall that.

2           Q    Okay. Were you involved in placing any phone calls for the President that  
3   afternoon?

4           A    I do recall there were phone calls he was taking. I was placing them, yes.

5           Q    Okay. Who were the calls that you were involved with placing or receiving  
6   on the President's behalf that day?

7           A    The only call I specifically remember -- and I believe it was an incoming call,  
8   but I'm not for certain -- is from Kevin McCarthy.

9           Q    Okay. What do you remember about the call from Kevin McCarthy?

10          A    I only recall that it was transferred to the President.

11          Q    Did the call come into your line or to the general White House switchboard  
12   line?

13          A    I believe the call came to Dan Scavino, and it was transferred from Dan's  
14   phone.

15          Q    From his cell phone or from his desk phone?

16          A    The call would have been transferred from a desk line. That's the only way  
17   you can transfer a call like that.

18          Q    Okay. So, at some point in the afternoon, Mr. McCarthy placed a phone  
19   call to Mr. Scavino's desk line, and it was transferred to the President. Is that correct?

20          A    That's generally what I recall.

21          Q    Okay. Were you involved in making that -- transferring that call?

22          A    I -- I -- yes.

23          Q    Okay. Where was the President at the time that he took that call?

24          A    He was in the dining room.

25          Q    And who was with him?

1           A     Not to repeat, but the doors into the dining room, there were several of  
2     them, and people would come in and out. They would come through the front and  
3     leave the back, and I wouldn't know they had left; or they'd come and go the back, and I  
4     wouldn't have known they were back there at all.

5           So I don't know who was back there other than the three individuals I shared that  
6     walked past my desk.

7           Q     And those individuals were Mr. Herschmann, Mr. Meadows, and Ms. Trump,  
8     Ivanka Trump?

9           A     Yes.

10          Q     Okay. Do you know whether any or all of those individuals were with the  
11     President at the time that he took the call with Leader McCarthy?

12          A     I don't know.

13          Q     Okay. What, if anything, do you know about the content of that  
14     communication between the President and Leader McCarthy?

15          A     I don't know anything about the content of that call.

16          Q     Even if you weren't involved in the call yourself, did you later hear from  
17     anyone else about the contents of that call?

18          A     Not that I recall.

19          Q     Okay. So earlier you told us that the President called you to ask what you  
20     thought. Was he in the dining room when he placed that call to you?

21          A     Yes.

22          Q     Okay. Was it before or after you remember connecting this call from  
23     Mr. McCarthy?

24          A     I believe it was before.

25          Q     Before? Okay. What do you remember about the President when he

1        called you?

2            A     I recall him asking me a question along those lines. I recall describing what  
3     I saw on television. I recall that he heard me. I don't know what he said. That's all I  
4     recall of the phone call.

5            Q     Okay. So you said that he called to ask you what you thought. Is there  
6     anything -- did he say anything else other than "what are you thinking"?

7            A     Not that I recall.

8            Q     Okay. And then you said that you described what you were seeing on TV.  
9     What was it that you were seeing at that time?

10          A     It appeared footage of some of the break-in.

11          Q     Break-in at the Capitol?

12          A     Yes.

13          Q     Okay. Any more specifics that you remember? Was it windows breaking  
14     or people entering into the Capitol? What more do you remember?

15          A     There was scenes of, you know, a crowd of people and entering the Capitol.

16          Q     Okay. Do you remember what station, what television station you had on  
17     in the TV in the outer Oval then?

18          A     I don't specifically recall, but we had a channel that you could watch a lot of  
19     channels at the same time.

20          Q     Sort of like the four split screen?

21          A     Yes.

22          Q     And what were the four channels that would have been on the -- if you  
23     remember specifically for the 6th or just in general, in the outer Oval TV?

24          A     We generally had the channel that had CNN, both FOXes, and MSNBC.

25          Q     Okay. And how did the President react when you told him what you were

1 seeing on the television?

2 A I don't remember a reaction. I don't specifically recall anything he said.

3 Q Do you recall did he -- did he say anything to you and are you saying that you  
4 just don't remember specifically what he said, or did he say anything at all?

5 A I recall getting the general sense he heard me. I don't recall him saying  
6 anything specific back to me.

7 Q Okay. And was he -- was he surprised by what you were telling him, or was  
8 it -- how do you characterize his reaction?

9 A I don't remember his reaction.

10 Q About how long did the call take place? How long did it last?

11 A Very short. It was a very short time.

12 Q Did he call any of your colleagues in the outer Oval, anyone else?

13 A During this time, he was calling me to place calls. And we had a line where  
14 all the phones rang. I recall picking up and placing phone calls during this time.

15 Q Okay. Do you know why he was calling to ask you this?

16 A Why he asked me what I thought?

17 Q Yes.

18 A I don't know.

19 Q Okay.

20 BY [REDACTED]

21 Q Ms. Michael, let me just make sure I understand. He called you and asked  
22 you what you thought, and you told him not what you thought but what you saw. Is  
23 that right?

24 A I recall telling him what I was seeing on TV.

25 Q But that's not what you thought, right? He's looking for your opinion or

1       your thoughts about what you're seeing, not what you're seeing. Did you tell him what  
2       you thought? Did you answer his question about your interpretation or your thoughts  
3       about what was occurring?

4           A     I don't recall.

5           Q     The President of the United States in the middle of a riot at the Capitol calls  
6       you and asks you what you think, not what you see but what you think, and you don't  
7       recall what you told him other than just reporting what was on TV?

8           A     The TV is very large, and the coverage was on probably all four of the  
9       stations. So that was really all I was seeing.

10          Q     But, again, Ms. Michael, he asked you what you thought, not what was  
11       happening, what you thought. Did you tell him what you were thinking, not what you  
12       were seeing on TV but what you were thinking about what was happening?

13          A     The images I was seeing is the predominant memory I have.

14          Q     And you don't remember anything about his reaction, whether whatever he  
15       said or anything he expressed?

16          A     No, I don't recall.

17          Q     Did he often just call you to ask you what you thought about stuff?

18          A     He asked everyone what they thought. That was not unusual.

19          Q     Okay.

20          A     It happened to everyone.

21          Q     I'm sorry, go ahead.

22          A     He asked everyone of all ranks what they thought of a lot of things.

23          Q     You described the mood when you first arrived as distressed or distressing.  
24       Did you convey that to the President when he asked you what you thought about how  
25       distressing it was what was going on at the Capitol?

1 A I recall it being a very short call.

2 Q Let me ask again: Do you recall conveying to him in this very short call how  
3 distressing it was, how upsetting it was, how difficult it was to watch?

4 A I believe describing what I was seeing was relating that that is -- that's a  
5 distressful, horrible thing.

6 Q And he wasn't distressed? You don't recall him expressing any distress, any  
7 reaction at all. Is that right?

8                   A     I don't recall his response. I'm not saying he wasn't distressed. I just  
9     don't have a memory of his response.

10 Q Yeah, let me be clear. The President of the United States calls you and asks  
11 you what you think. You describe for him the violence occurring at the Capitol. And  
12 you don't remember him expressing any distress, any frustration, any anger, any  
13 anything. Is that right?

14 A The phones were ringing. A lot was happening. I don't recall.

15 Q Okay. Let me just be clear: You don't recall him expressing any distress,  
16 any frustration, any anger, any anything during that call when he asked you what you  
17 thought about what was going on at the Capitol. Is that right?

18 A I don't remember his reaction to my -- to my words.

19 Q You don't remember him expressing any distress. Is that right?

20 A I don't remember him expressing anything.

21 Q In the middle of a riot at the Capitol, you don't remember him expressing  
22 any emotion whatsoever, correct?

23 A He didn't express emotions to me.

24 [REDACTED] Okay. Thank you.

25 BY

1 Q Ms. Michael, just a couple of followup.

2 I know you said that the call with the President was short. Can you give us an  
3 approximate number of minutes or seconds that call with the President was?

4 A Just a matter of seconds.

5 Q Okay. So about like 30 seconds, 45 seconds?

6 A It could be 10 seconds or less.

7 Q Okay. Do you know whether or do you recall whether the President had a  
8 TV or multiple TVs in the dining room?

9 A Yes, he had a TV in the dining room.

10 Q Do you know whether he was watching TV in the dining room when you  
11 talked to him on January 6th?

12 A I don't recall being in the dining room for any length of time. It's my  
13 understanding he was watching television.

14 Q Did he have -- do you recall was it a similar setup in the dining room where  
15 you could watch multiple channels at the same time as it was in the Oval Office -- outer  
16 Oval Office, excuse me?

17 A His -- his cable box I believe was different than ours, and I think he watched  
18 a single news predominantly versus the quad.

19 Q Do you recall which -- typically, which channel he would watch in the dining  
20 room?

21 A He would watch all types of channels, all types of news channels.

22 Q Specifically on the 6th, do you know what channels he was watching in the  
23 dining room?

24 A I don't know.

25 Q Did you ever see what channels were on at any point that day on January

1       6th?

2           A   Not that I recall.

3           Q   I know you said a few times that you described what you saw on TV.  Do  
4       you recall whether you described to President Trump that you saw windows being  
5       broken?

6           A   I believe at that point they were covering the break-in.

7           Q   So that's -- is that what you described to President Trump, that there was a  
8       break-in at the Capitol?

9           A   Yes.

10          Q   And you don't recall his response to you describing that there had been a  
11       break-in at the Capitol?

12          A   I don't remember his response.

13          Q   Do you remember how the call ended?

14          A   I don't specifically recall how it ended.  Like I said, he was placing lots of  
15       calls and he would call me to place calls.  So it could be that he had called me back in a  
16       short time to place a call.  I don't know how that one specifically ended.

17          Q   Do you recall -- at any point -- after you had the call with President Trump,  
18       did you talk to anyone about the call that you had just had with him?

19          A   Not that I recall.

20          Q   And you said earlier that you don't know if he talked to anyone in the outer  
21       Oval, made a similar call to them asking them their thoughts on what was happening on  
22       the Capitol that day.  Is that right?

23          A   Not that I recall.

24           BY [REDACTED]

25          Q   Ms. Michael, you described to us a phone call that you were involved in

1       transferring from Leader McCarthy to President Trump. You said that your call with the  
2       President occurred before this call came in from Mr. McCarthy.

3                  About how far in advance do you remember, how much time do you think lapsed  
4       between you speaking to the President and being involved in that call from Leader  
5       McCarthy?

6                  A      I have no idea.

7                  Q      Okay. Did President Trump speak to Mr. McCarthy more than one time on  
8       the 6th?

9                  A      I don't recall.

10                 Q      Okay. At about 2:44 p.m. in the afternoon of January 6th, there was -- a  
11       woman was shot inside the Capitol. Do you remember that?

12                 A      I don't -- it's hard to separate. I don't know that to be a fact at that time.

13                 Q      Do you remember at any point on January 6th finding out that there had  
14       been a shooting, someone had been shot inside the Capitol?

15                 A      Generally, I was aware that had happened.

16                 Q      Sorry. I didn't mean to interrupt you.

17                 A      That's okay.

18                 Q      How did you become aware of that?

19                 A      I don't recall if it had been reported at that time or -- I don't recall how I  
20       found out.

21                 Q      Okay. Let's look at exhibit 23, please.

22                 Mr. Benson. Pardon me. Can we take a quick break?

23                 [REDACTED] Sure. That's a good idea. Let's go off the record now.

24                 [Recess.]

1 [3:40 p.m.]

2 [REDACTED] We're going back on the record. It's 3:44 here in Washington.

3 BY [REDACTED]

4 Q Ms. Michael, okay, so we're staying with the afternoon of January 6th.

5 I wanted to direct your attention to exhibit 23, please. This relates to a question  
6 I had posed to you right before we took a little break.

7 [REDACTED], could you zoom out a little bit just so that we can see the, kind of,  
8 document in whole?

9 Great.

10 Ms. Michael, do you recognize this document?

11 A No.

12 Q Okay. Do you recognize the type of paper that this note is written on?

13 A It looks to be written on what we called pocket cards.

14 Q Okay. What were the pocket cards used for?

15 A Either written or printed things. You could print on those too. They were  
16 used, I mean, what paper is used for.

17 Q Okay. Were they used to pass notes to the President?

18 A Yes.

19 Q Okay.

20 Do you recognize the handwriting on this document?

21 A I don't recognize that handwriting.

22 Q It's not your handwriting?

23 A It does not appear to be my handwriting.

24 Q Okay.

25 So this document reads, "1 x CIVILIAN GUNSHOT WOUND TO CHEST @ DOOR OF

1       HOUSE CHAMBER."

2                 Right before we took a break, I asked you if you remembered learning that there  
3       had been a gunshot wound, shots fired inside the Capitol. Do you remember coming to  
4       learn of this information on the afternoon of January 6th?

5                 A     I believe I was aware. I'm not sure how I became aware.

6                 Q     Okay. Did you ever get a document, either this one or another one, that  
7       informed you that this had occurred?

8                 A     Not that I recall.

9                 Q     Okay.

10                 How did the President come to learn that there had been a gunshot wound at the  
11       door of the House Chamber?

12                 A     I don't know.

13                 Q     Okay. Did you pass a note to the President, or are you aware of anyone  
14       else in the Outer Oval Office being asked to do so?

15                 A     I don't recall.

16                 Q     Okay. Generally, do you recall any other notes being passed to the  
17       President in the dining room on the afternoon of the 6th?

18                 A     The dining room was completely separate, and people came in the back. If  
19       there was notes passing, I don't know.

20                 Q     Okay. So are you saying that no one asked you or any of your colleagues in  
21       the Outer Oval to convey information by passing notes to the President in the dining  
22       room?

23                 A     Not that I recall.

24                 Q     Okay.

25                 Do you know what President Trump's reaction was to learning that there had been

1       a gunshot wound in the Capitol?

2           A    I don't know his reaction.

3           Q    Okay.

4           Did you speak to anyone else in the White House about the gunshot wound in the  
5       afternoon of January 6th?

6           A    Not that I recall.

7           Q    What was your personal reaction when you learned of that news?

8           A    All loss of life is horrible. It's very distressing to hear that.

9           Q    Did you do anything after you learned that information?

10          A    I don't recall.

11          Q    Okay. You learned, obviously, distressing information in the middle of a  
12       distressing day, as you've described to us. And so your testimony is you don't recall  
13       whether you did anything after learning of that information?

14          A    I don't recall.

15          Q    Okay.

16          Let's look at exhibit 21, please. We'll zoom out for you a little bit so we can see  
17       the whole thing.

18          Thank you very much, [REDACTED]

19          Do you recognize --

20          Mr. Benson. Pardon me. Pardon me. Can you just scroll it up a little more?  
21       Because we still have these subtitles which are blocking it.

22          [REDACTED] Sure. Does that help?

23          Mr. Benson. Yes, I think so.

24          [REDACTED] Okay.

25          BY [REDACTED]

1           Q     Do you recognize this document?

2           A     Is "immediately" the last word that you see?

3           Q     Yes, it is. It ends with "immediately," uh-huh. Do you recognize this  
4 document, Ms. Michael?

5           A     I do not recognize that document.

6           Q     Okay. This looks like another example of a pocket card, you know, a piece  
7 of paper smaller than a normal letter-size paper, but this one says at the top "Chief of  
8 Staff."

9           Were you familiar with pocket cards like this for the chief of staff?

10          A     I'm familiar he had his own stationery.

11          Q     Okay. And whose handwriting is this on this document?

12          A     I don't know whose handwriting that is.

13          Q     It's not familiar to you at all?

14          A     No.

15          Q     Okay.

16           And it says, "ANYONE WHO ENTERED THE CAPITOL ILLEGALLY" -- and then  
17 "ILLEGALLY" is crossed out -- "WITHOUT PROPER AUTHORITY SHOULD LEAVE  
18 IMMEDIATELY."

19           Do you remember any communications with anyone in the White House on  
20 January 6th about a statement like this?

21          A     I don't recall.

22          Q     So, earlier, you were telling us you recall certain people, but you're not  
23 conclusive that they're all of the people, who went in and out of the President's dining  
24 room on the afternoon of January 6th. You told us you recalled seeing Mr. Herschmann,  
25 Mr. Meadows, and Ms. Trump, Ivanka Trump, going in. Is that correct?

1           A    Yes.

2           Q    Do you also recall General Kellogg going into the dining room or meeting  
3       with the President at any point during the afternoon of January 6th?

4           A    I recall him very briefly in the Outer Oval, and I don't know whether he left  
5       out or in from there.

6           Q    Okay. Did you talk to General Kellogg that day?

7           A    I don't recall a specific conversation.

8           Q    Any general recollection of communications with him?

9           A    I generally said hello to people that walked in my office. I don't recall a  
10      conversation with him that day.

11          Q    Okay. So I know generally you would be cordial to anyone who's walking  
12      through your office, as you've just stated. But we're talking now about the time period  
13      after you arrived at work, somewhere after 2:30 or 3 o'clock in the afternoon, where you  
14      already knew that the Capitol was under attack, that you were coordinating phone calls  
15      for the President during this distressing situation.

16          During that time period, when you interacted with General Kellogg, what do you  
17      remember about communications that you had with him?

18          A    I don't recall anything other than him being there briefly and then leaving.

19          Q    Okay. And do you remember seeing him talking to anyone else?

20          A    I don't recall.

21          Q    Okay. What was his demeanor during this time?

22          A    Everyone was distressed.

23          Q    Okay.

24          Did you see Ms. McEnany go into the Oval Office or the dining room that  
25      afternoon?

1           A   Not that I specifically recall.

2           Q   Did you have any interactions or communications with Kayleigh McEnany  
3   that afternoon?

4           A   Not that I recall.

5           Q   Okay.

6           I think earlier you told us that you were involved in connecting phone calls to the  
7   President while he was in the dining room. Let's talk about phone calls coming in.

8           You identified one that came in through Mr. Scavino's desk line from  
9   Representative Kevin McCarthy. Who else called in for the President that afternoon?

10          A   I don't recall any other callers by name.

11          Q   Not any at all?

12          A   I know that there were callers. That's all I recall.

13          Q   Any others that came in through Mr. Scavino's line?

14          A   Not that I recall.

15          Q   Did anyone else from the congressional leadership call in looking to speak to  
16   the President?

17          A   Not that I recall.

18          Q   What about other agencies? Anyone calling in for the President from the  
19   Department of Defense?

20          A   Not that I recall.

21          Q   The Department of Justice?

22          A   Not that I recall.

23          Q   What about calls that the President asked you to make, outgoing calls for  
24   him? Who did he ask you to connect him to on the afternoon of January 6th?

25          A   I don't recall anyone specifically.

1           Q     Okay. Did he ask you to connect him with any of the congressional  
2     leadership after they had been evacuated from the Capitol?

3           A     Not that I recall.

4           Q     Did he ask you to make any phone calls -- connect any phone calls to the  
5     Department of Defense after the riot had begun at the Capitol?

6           A     I don't recall.

7           Q     What about for the Department of Justice, any to the leadership of  
8     Department of Justice after the riot at the Capitol began?

9           A     I don't recall.

10          Q     Okay.

11          What about to the Vice President or his staff? Did the President ask you to  
12     connect any phone calls on the afternoon of January 6th to the Vice President or to his  
13     staff?

14          A     I don't recall.

15          Q     Are you aware of any calls, either whether you connected them or if they  
16     were made on any other device or through any other person -- are you aware of any  
17     outreach from the President to the Vice President or his staff on the afternoon of  
18     January 6th?

19          A     I don't recall.

20          Q     During these circumstances, when the joint session of Congress has been  
21     stopped because the Capitol is under attack, the Vice President has been evacuated to a  
22     secure location, if the President asked you to connect a phone call to the Vice President  
23     or his staff, would you remember that?

24          A     I don't know if I would remember that. I don't recall doing that.

25          Q     Why wouldn't you remember that under these completely unprecedented

1       circumstances?

2           A    I don't recall.

3           Q    Sorry. My question is really more -- you said that you don't know whether  
4       you would have noted such a fact. You don't know whether you would've remembered  
5       it. And I'm kind of -- I'm wondering how that can be.

6           A    Remembered what, specifically?

7           Q    Whether the President had made any phone calls or attempted to reach the  
8       Vice President or his staff?

9           A    There was a lot of calls. I don't know who he called.

10          Q    Okay.

11          Did the President ever express to you on the afternoon of January 6th any concern  
12       about the safety or well-being of the Vice President?

13          A    I don't recall.

14          Q    Was he aware of the Vice President's whereabouts on the afternoon of the  
15       6th?

16          A    I don't know.

17          Q    Okay.

18          We have developed a fair amount of evidence that there were multiple people  
19       speaking to the President on the afternoon of January 6th and a great deal of others that  
20       were attempting to reach individuals inside the White House during the afternoon of the  
21       6th to encourage the President to say something to make the rioters go home.

22          Are you aware of those communications?

23          A    I'm generally aware people were calling him and he was placing calls.

24          Q    That's it?

25          A    That's it.

1           Q     Okay. So you don't remember any discussion about people who were  
2     gathering or passing through the Outer Oval to speak to the President about the desire  
3     for the President to say something to encourage rioters to go home?

4           A     I don't recall there being a lot of standing around that day. If people were  
5     walking through, they were walking through quickly.

6           Q     Okay. So, even if they were walking through quickly, in a very, I'm sure,  
7     pressure-filled environment, on a very distressing day, are you aware of the fact that  
8     there was discussion going on and many people were communicating their wishes to the  
9     President that he say something to encourage the rioters to go home?

10          A     It's hard to separate the reporting of that time and what I was aware of then.

11          Q     Okay. To the extent you can, can you put your mind back to the time  
12     period of January 6th and recall people coming through your office, admittedly hurriedly,  
13     but urgently trying to speak to the President, encouraging him to make a statement to  
14     encourage the rioters to go home?

15          A     I don't know the substance of their conversations in the dining room when I  
16     was sitting at my desk.

17          Q     But, outside of the communications in the dining room, the communications  
18     that you may have had with them or you observed them having with each other, what do  
19     you remember about people trying to encourage the President to say something to make  
20     the rioters go home?

21          A     I don't recall those conversations happening in front of me.

22          Q     Okay.

23          Do you remember that there came a time where the President recorded a video  
24     statement that afternoon?

25          A     Yes, I recall him recording a statement.

1           Q    Okay. What do you recall about how that came about?

2           A    I recall the video team coming over and setting up in the Rose Garden. I  
3   recall the President going out to the Rose Garden and recording it and then coming back  
4   into the Oval.

5           Q    Okay. You said the video team came to set up. Who specifically was a  
6   member of the video team that came to set up for this video statement?

7           A    The video team had several interchangeable people, and the President  
8   recorded a lot of videos on other days. I don't recall specifically which members of the  
9   video team were there that day.

10          Q    Okay.

11          Whose idea was it to record this video?

12          A    I don't know.

13          Q    Who was involved in preparing the remarks, the text of what the President  
14   would say?

15          A    I don't recall.

16          Q    There have been reports that President Trump was resistant to the idea of  
17   doing this video statement. Is that accurate?

18          A    It's my recollection he was in the dining room and he came out from the  
19   dining room and went into the Rose Garden. And whatever conversations he had prior  
20   to that, before, in the dining room, I don't know about those conversations.

21          Q    Okay.

22          Was there a script prepared for his remarks on this video statement?

23          A    I generally recall a script of some kind in his hands as he walked out to the  
24   Rose Garden.

25          Q    Do you remember who wrote the script?

1           A    I don't know.

2           Q    We have heard testimony from other witnesses that the script was being  
3    edited on Mr. Ferrer's computer in the Outer Oval.  Is that accurate?

4           A    I don't recall that.

5           Q    Okay.

6           Was Mr. Herschmann there during the preparation of this script?

7           A    Mr. Herschmann was there in the afternoon.  I don't recall the preparation  
8    of this script in any way.

9           Q    Okay.

10          In the time that you recall the President coming from the dining room, through  
11    the Oval Office, through the Outer Oval, to go to the Rose Garden, who else was with  
12    him?

13          A    I don't know if that was his route.  He could've gone from the Oval to the  
14    Rose Garden.  I don't remember who was with him making that walk.

15          Q    Okay.  Fair point.  Who generally do you remember being in the Outer  
16    Oval when the President went to the Rose Garden?

17          A    I don't know that.  I don't --

18          Q    Were you there?

19          A    Yes, I was there.

20          Q    Okay.  So you saw the President at some point pass through the Outer  
21    Oval, go to the Rose Garden.  Is that correct?

22          A    I'm not sure if he passed through the Outer Oval.  There was doors from  
23    the Oval to the Rose Garden directly.

24          Q    Okay.  So you don't remember whether he passed by you or whether he  
25    went a different route to the Rose Garden?

1           A    Correct, I don't remember.

2           Q    Okay.

3           Let's look at exhibit 25, please.

4           Ms. Michael, do you remember who was standing with him in the Rose Garden  
5       while he filmed the video?

6           A    Beyond the video team, I recall Eric Herschmann in the Rose Garden.

7           Q    Anyone else?

8           A    I don't recall.

9           Q    Okay.

10          Do you recognize this document that says "Remarks" at the top?

11          A    I recognize the format of the document. I don't --

12          Q    What does the format indicate to you?

13          A    That was consistent with how remarks were put on a piece of paper.

14          Q    Okay. For the President to read on, you know, something like this video  
15       statement?

16          A    Yes.

17          Q    Okay. Are these the remarks that the President gave on the video  
18       statement that afternoon?

19          A    I have no knowledge of that. I was not in the Rose Garden.

20          Q    Okay.

21          We could play you the video if you'd like to, but I can represent to you that these  
22       are not the remarks that he gave. So my question for you is, do you remember there  
23       being multiple versions of the remarks?

24          A    I don't recall that.

25          Q    No conversations that you were aware of about what the President should

1 say or which version of the remarks he should deliver?

2 A I don't recall the preparation of the remarks or versions, no.

3 Q Okay.

4 How long was the President in the Rose Garden for this video recording?

5 A I recall it being a shorter time period.

6 Q About how long? Two minutes? Five minutes? Ten minutes?

7 Twenty?

8 A That's hard to say. I could only estimate. Probably about 5 minutes.

9 Q Okay. Do you know whether the President recorded multiple versions of  
10 the video statement?

11 A I don't know that.

12 Q Where did he go after the video statement, you know, the recording was  
13 completed in the Rose Garden?

14 A I don't specifically recall, but he headed towards the Oval. He didn't go  
15 back to the residence.

16 Q Okay. Did you interact with him at any point there when he returned to  
17 the Oval Office?

18 A I don't recall.

19 Q Okay. Do you remember who was with him after that point?

20 A I don't recall.

21 Q Okay.

22 How long did the President stay in the Oval Office on January 6th? And I -- let  
23 me rephrase -- in the West Wing, as opposed to the residence.

24 A I recall that he returned to the residence sometime in the 6 o'clock or early  
25 6 o'clock hour.

1           Q    And how long did you stay at the White House on January 6th?

2           A    I recall leaving shortly after he left.

3           Q    Did you go home?

4           A    I went home.

5           Q    Did you speak to the President again after you went home that day?

6           A    Not that I recall.

7           Q    Okay.

8                 So, during the time period after he recorded the video statement, when he came  
9                 back into the Oval Office, what can you tell us about what else happened that day?

10          A    I don't recall how much time there was. I'm sure the video has a  
11         timestamp, but I don't know what length of time was after the video before he went  
12         upstairs.

13          Q    So, yeah, I can give you that information. So the video was posted online  
14         about 4:17. I could show you if you wish, but the daily diary that we were looking at  
15         before reflects that he went out to the Rose Garden at about 4:03 and was there for, as  
16         you estimated, about 5 minutes, until 4:07.

17                 So that would -- if he went up to the residence after 6 o'clock, that would leave at  
18         least an hour and a half, maybe more than that, of his time in the Oval Office on  
19         January 6th.

20          A    Okay.

21          Q    Okay. So what do you remember about who else was he meeting with that  
22         afternoon?

23          A    I believe he went back into the dining room. I don't recall him being in the  
24         Oval for any extended time that afternoon. I don't know who else he met with in the  
25         dining room.

1           Q     What about phone calls?   Do you remember incoming phone calls in the  
2     afternoon?

3           A     I don't recall.

4           Q     You were connecting calls for the President throughout this time period, I  
5     assume?

6           A     Yes.   During the afternoon, I was connecting phone calls.

7           Q     But you don't remember who any of those individuals were who were calling  
8     in for the President?

9           A     Beyond Kevin McCarthy, no.

10          Q     Okay.

11          What about placing outgoing calls for the President?   Were you continuing to  
12     place outgoing calls that day?

13          A     Assumably, yes.   I don't recall specifically who.

14          Q     Okay.

15          Did the President -- did you connect calls with Professor Eastman on the afternoon  
16     of January 6th?

17          A     I don't recall.

18          Q     Okay.   What about Mr. Giuliani?

19          A     Again, I don't recall.

20          Q     Okay.

21          Let's go back to exhibit 15.   So, when it comes up, if we could look at page 3,  
22     please.

23          Okay, yeah.   And if we could just scroll down so that they can see the bottom  
24     half of the page at the top.

25          That's great.

1           Ms. Michael, can you see this? This is the document that's "The Daily Diary of  
2 President Donald J. Trump" that we were looking at earlier.

3           And I'd like to draw your attention to the part at the bottom of the page, it starts  
4 at 1:21 p.m., so just after the President returns from the Ellipse and goes to the Oval  
5 Office. It has him 1:19 p.m., returning; 1:21 p.m., meeting with his valet; and then  
6 4:03 p.m., going to the Rose Garden.

7           So you've told us today -- you've described one such call, but told us that there  
8 were many calls that the President received or placed on January 6th. And my question  
9 is, we're wondering why those calls are not reflected on this daily diary?

10          A     This is a document I've never seen before. I'm not familiar with this format  
11 or the way it's listed. I don't know why calls are not there.

12          Q     Okay.

13          Earlier, you know, we had looked at the schedule from the morning, and it reflects  
14 all of the calls that were placed through the White House switchboard. In particular,  
15 you noted, you know, this wasn't a time that you were in the office so you got email  
16 confirmations when the White House switchboard placed calls for the President.

17          Did you also receive email confirmations of calls placed for the President or  
18 received by the President after 1:21 that day?

19          A     Not that I recall.

20          Q     Why is that? Why would the White House switchboard stop sending  
21 confirmations of calls?

22          A     I don't know.

23          Q     Did you find it to be unusual?

24          A     I -- I don't know what you mean by that.

25          Q     Well, you had, at that point -- you've told us, you had, at that point, been

1 executive assistant for President Trump for more than a year. You told us that you  
2 routinely received email notifications when the White House switchboard placed calls or  
3 handled incoming calls for the President, and that's how you would stay abreast of the  
4 President's communications even if you weren't there in your desk.

5 So were there other times, during the time that you were executive assistant,  
6 where those notifications from the White House switchboard ceased?

7 A The White House switchboard connected calls when he was in the residence.  
8 Q But not -- they wouldn't have any records of calls placed while he was in the  
9 Oval Office or the dining room?

10 A Unless he placed a call through the operators while he was in the Oval.

11 Q Okay. What other records would've been maintained for calls placed while  
12 he was in the Oval Office or the dining room?

13 A I don't know.

14 Q Okay.

15 There are -- if we could look at page 4, please.

16 This picks up after 6:27 p.m. at the bottom of the page we were just looking at and  
17 on page 4 begins at 6:54 p.m. It lists a number of phone calls that the President made  
18 that evening. They include Pat Cipollone, Dan Scavino, Kurt Olson, Mark Martin, Kurt  
19 Olson again, Cleta Mitchell, and Rudy Giuliani.

20 Were you involved in any of these phone calls that the President made on the  
21 evening of January 6th?

22 A This document looks like it indicates these calls were placed at the  
23 White House switchboard. I don't recall handling any of those calls.

24 Q Okay. Were there any calls that you were asked to place or that came in to  
25 you on the evening of January 6th?

1           A    Not that I recall.

2           Q    Okay.

3                 Anything else about January 6th that is notable for you that you remember that  
4 we haven't asked you about yet?

5           A    It was a very distressing day, as I've shared, and I have nothing more to add.

6           Q    Okay.

7                 BY [REDACTED]

8           Q    Just a couple more questions, Ms. Michael, about the Rose Garden thing.

9                 So you indicated that Mr. Herschmann was present with the President in the Rose  
10 Garden when the recording was made. Is that right?

11          A    As far as I recall, yes.

12          Q    Do you know what role, if any, he played in shaping the President's words?

13          A    I couldn't hear anything from where I was.

14          Q    I understand that, but I'm talking about now. In the time since, have you  
15 learned anything from Mr. Herschmann or others about the role he played with respect  
16 to the President's words used in the Rose Garden video-recorded statement?

17          A    I don't recall having any discussions about that.

18          Q    With him or others?

19          A    Correct.

20          Q    Do you know if anyone had to push the President to be more affirmative  
21 about telling people to go home? Did you ever hear any discussion at any time about  
22 people needing to encourage him to do that?

23          A    I don't recall.

24          Q    And I'm not just talking about on that day. I'm talking about now, at any  
25 time in your life, have you ever heard anyone describe the fact that they needed to

1 encourage him to be more forceful in that address?

2 A I don't recall.

3 Q Mr. Cipollone is referenced in the call logs that [REDACTED] just asked you  
4 about. Do you remember him being at all in the Oval or the dining room on the  
5 afternoon of the 6th?

6 A I don't have a specific memory of him walking by my desk. Again, he  
7 could've gone in the back. I don't know.

8 Q Okay. You listed some other people that you're sure were back there.  
9 You don't recall Mr. Cipollone on that list as being someone who was in the dining room  
10 at some point?

11 A I don't recall.

12 Q All right.

13 We also have information that the video itself was edited or trimmed in some way  
14 before it was posted. Do you have any information about that, about that process of  
15 taking it from what was recorded to what was ultimately posted?

16 A I was not involved with the video team or uploading something like that, no.

17 Q Well, we were told specifically that it was done at Mr. Ferrer's desk, using his  
18 computer in the Outer Oval. Do you remember that?

19 A That seems very unlikely. Videos were edited somewhere else, on video  
20 team's computers, in my memory.

21 Q Okay. So you don't remember any editing or anything having to do with  
22 the video statement after it was recorded happening at Mr. Ferrer's computer or his  
23 desk --

24 A No.

25 Q -- on the 6th?

1 A I don't recall that.

2 Q Okay.

3 [REDACTED] Okay. That's it.

4 [REDACTED] That's it? Okay.

5 BY [REDACTED]:

6 Q Ms. Michael, just a couple of followups.

7 I think what you testified today is, as far as your understanding in the afternoon  
8 when you were at the White House, it seems as though President Trump was in the dining  
9 room for most of that afternoon until 6:00 p.m., except for maybe a brief trip to the Rose  
10 Garden. Is that right?

11 A Yes. That's what I recall.

12 Q Do you know why he was in the dining room specifically?

13 A I don't know why. That was not unusual.

14 Q Okay. Do you remember other instances, other days where he spent over  
15 4 hours straight in the dining room?

16 A He had a pattern of taking meetings in the Oval and, when meetings were  
17 concluded, he would be in the dining room.

18 Q Would he typically go to the dining room to watch television?

19 A He went to the dining room, in my understanding, to continue working.

20 Q Do you know why he would go to the dining room and not stay in the Oval  
21 Office to continue working?

22 A I don't know why he had that habit.

23 Q Were there TVs in the Oval Office?

24 A There were not.

25 Q Okay. So, if he wanted to watch TV, is it fair to say he would either need to

1 go into the dining room or to Outer Oval, at least in his immediate vicinity?

2 A That's where the TVs were.

3 [REDACTED] That's it for me.

4 [REDACTED] Okay.

5 BY [REDACTED]

6 Q Let's talk about January 7th briefly. Were you at work on the 7th,  
7 Ms. Michael?

8 A I don't have reason to believe I wasn't. I don't have a specific recollection  
9 of that day.

10 Q Okay.

11 Let's look at exhibit 28, please. I'm going to show you -- it's getting loaded now,  
12 so just to let you know ahead, we're going to show you a draft statement that says -- it's  
13 titled "Remarks on National Healing."

14 Do you remember President Trump giving such remarks on January 7th?

15 A I don't recall that.

16 Q You don't. Do you recall any discussion of the President giving a statement  
17 or addressing the Nation in any way?

18 A I don't recall.

19 Q Okay.

20 So this is exhibit 28. Similar to documents you've identified for us before, does  
21 the format of this document look familiar to you?

22 A This is how remarks were printed, yes.

23 Q Okay. And do you remember specifically these remarks being printed for  
24 the President?

25 A No, I have no recollection of that.

1           Q     Okay.

2           This document shows various words or lines being struck through. And then, in  
3       the fourth paragraph, you could see someone's handwriting, some additional language  
4       that says "will pay."

5           Who made those edits on this copy of this document?

6           A     I don't have firsthand knowledge of that.

7           Q     Do you recognize the handwriting or the style of editing here?

8           A     The handwriting looks like the President's handwriting.

9           Q     Okay. So is it fair to assume that these are his edits to prepared remarks?

10          A     I could assume that.

11          Q     Okay.

12          Do you know who drafted these remarks?

13          A     I'm not aware.

14          Q     Okay.

15          So the first, you know, lengthy strike-through is in the end of the third paragraph  
16       there. It's in the top of your screen. It says, "I am directing the Department of Justice  
17       to ensure all law breakers are prosecuted to the fullest extent of the law. We must send  
18       a clear message -- not with mercy but with JUSTICE. Legal consequences must be swift  
19       and firm."

20          Why did the President strike out that language from these prepared remarks?

21          A     I have no idea.

22          Q     Did you have any communications with him or with any other White House  
23       staff about his edits to these remarks?

24          A     I don't recall these remarks. I don't recall conversations about these  
25       remarks.

1 Q Okay.

2 Let's look at exhibit 30 really quickly.

3 So this is another document that starts, "What the people who entered the  
4 Capitol did on Wednesday was inexcusable and unforgiveable."

5 Do you remember seeing this document?

6 A Could you scroll to the very top of it?

7 Q Sure. It actually just kind of starts. There's no header.

8 A I don't recognize that document.

9 Q Okay.

10 Were you aware of multiple versions of proposed remarks for the President to  
11 give on January 7th?

12 A I'm not aware of that.

13 Q Okay. So you didn't have any conversations with anyone in the  
14 White House about what the content of his statement should be?

15 A Correct.

16 Q Okay. And what about the President? Did you have any interactions with  
17 him about the concept of making a statement to the Nation on January 7th?

18 A Not that I recall.

19 Q Okay. How, generally, was the President's demeanor on January 7th?

20 A I have little to no recollection of any of the days following January 6th.

21 Q Okay.

22 I think I -- I meant to ask you this, but I don't think I did. When he left the West  
23 Wing to go up to the residence on the evening of January 6th, did the President say  
24 anything to you?

25 A I don't recall.

1           Q    No pleasantries exchanged or anything like that?

2           A    I don't recall.

3           Q    What do you -- what was his demeanor when he left for the residence that  
4 evening?

5           A    I don't recall.

6           Q    Was he upset or, as you've said before, distressed?

7           A    I don't recall anything about his departure that evening.

8           Q    Did you see him when he left?

9           A    To leave, he would have to walk by at least the colonnade, which I would  
10 see. I don't remember the way in which he left that night.

11          Q    Okay. So you're in the Outer Oval. You have to take note that he's  
12 leaving the West Wing to go to the residence for the evening. It's the end of  
13 January 6th, a totally unprecedented and, as you've described, distressing day. Do you  
14 remember anything at all about the President's demeanor that evening?

15          A    I don't recall.

16          Q    Okay.

17          [REDACTED] Anything else?

18          [REDACTED] No.

19          [REDACTED] Okay.

20          BY [REDACTED]

21          Q    Ms. Michael, real quick, we've heard from other witnesses that on  
22 January 6th they were waiting to see what Vice President Pence was going to do during  
23 the joint session of Congress. Was that something that you were paying attention to?

24          A    I don't recall paying attention to that.

25          Q    Do you remember when he released -- or, his office released a statement on

1       January 6th about what he was going to do during the joint session?

2           A     After I left that night, I don't recall being connected to the internet and  
3       continuing to monitor developments.

4           Q     And, just to be clear, the Vice President's statement, it came out, our  
5       understanding is, in the middle of the day, right before, I believe, President Trump spoke  
6       on the Ellipse. So it would've been in the middle of the day on January 6th.

7           Do you remember that statement coming out?

8           A     I don't recall that.

9           Q     So you don't recall whether you were tracking or paying attention to what  
10      Vice President Pence was going to do that day.

11          A     I don't recall being aware of that.

12          Q     Do you know whether others in the White House were?

13          A     I don't recall having a discussion about that.

14          Q     All right. Did you ever hear anyone make, you know, any comments like, "I  
15      wonder what Vice President Pence is going to do during the joint session"?

16          A     I don't recall that.

17          Q     Okay.

18          So, Ms. Michael, we're going to switch gears a bit and go back in time to  
19      November 2020, so specifically election day.

20          Do you recall whether you were at the White House on election day, which was  
21      November 3, 2020?

22          A     Yes. I recall being at work on election day.

23          Q     Okay. Were you there in the evening?

24          A     I was, yes.

25          Q     So we understand that President Trump was at the residence for a portion

1       during the evening to work on his remarks that he was going to give that night.   Were  
2       you aware of that?

3           A     I recall generally a period of time in the evening that he was in the residence.  
4       I don't have knowledge of what he was doing.

5           Q     Did you go up to the residence as well that evening?

6           A     I was not in the private residence that evening.

7           Q     Where -- and maybe you can describe it to me since I'm not aware of.   If  
8       you weren't in the private residence, were you in another portion near the residence, if  
9       not the private portion?

10          A     Some people describe the entire White House besides the West Wing as  
11       "the residence."   That's the recognizable exterior of the White House.   So you could  
12       loosely say "I'm in the residence" if you're in the Red Room or the State Dining Room.

13          But if you mean you're in the residence where the President lives, you're referring  
14       to the top two floors of that residence.

15          Q     So we understand the President was in the -- I believe it's called the Yellow  
16       Oval.   Does that sound right?

17          A     I don't know where he was that night.   That is in the private residence.

18          Q     Did you ever go to the Yellow Oval during election night 2020?

19          A     No.

20          Q     So we understand that there was some discussion and a debate about  
21       whether President Trump should say he won the election that night.   Did you ever hear  
22       about that?

23          A     I wasn't part of that.   I don't recall that.

24          Q     Did you ever hear that there were disagreements amongst advisors to  
25       President Trump whether he should say in his remarks to the public that he won the

1 election?

2 A I don't recall.

3 Q Did you ever hear that Mr. Meadows told President Trump that he should  
4 not say that he won the election?

5 A I don't recall that.

6 Q Do you remember hearing that Mr. Giuliani told President Trump that he  
7 should say that he won the election on election night?

8 A I don't recall that.

9 Q Did you have any involvement in the preparation of President Trump's  
10 remarks for that night, on election night?

11 A No.

12 Q Do you know who was involved?

13 A I can assume it was the team that was part of his speech team. I don't have  
14 a specific knowledge.

15 Q Do you know whether in his prepared remarks it said that he won the  
16 election?

17 A I have no idea.

18 Q Do you know, when he did in fact say that he won the election during his  
19 speech that night, whether that was ad-libbed or he was reading from a script?

20 A I don't know.

21 Q Okay.

22 In the days following election day, so, you know, after November 3rd and I'll say  
23 before November 7th, to the extent those days make a difference in your recollection, do  
24 you recall working on anything related to the 2020 election -- you know, maybe tracking  
25 down allegations of fraud or talking to folks about allegations of election fraud?

1           A    I don't recall that.

2           Q    Do you recall participating or organizing any meetings related to allegations  
3    of election fraud between November 3rd and November 7th, 2020?

4           A    I don't recall that period -- that period of time doesn't stand out to me in a  
5    way I would recall specific meetings.

6           Q    After election day 2020, did you have any conversations with  
7    President Trump about any allegations of election fraud?

8           A    Not that I recall.

9           Q    Okay. Do you ever remember talking about dead people voting in the 2020  
10   election with President Trump?

11          A    I don't recall.

12          Q    How about ballot dumps from mail-in voting?

13          A    I don't recall having a conversation like that.

14          Q    Do you remember ever talking to President Trump about the Dominion  
15   voting machines and what might've happened, switching votes or how they could've been  
16   manipulated in connection with the 2020 election?

17          A    I don't recall.

18          Q    Do you recall hearing -- overhearing or hearing about conversations that  
19   President Trump had with other people about any allegations of election fraud after  
20   election day?

21          A    I recall generally that conversations were had with people interested in the  
22   election with the President.

23          Q    What conversations do you remember?

24          A    I don't recall specifics. I just recall very general topics, the election.

25          Q    What topics do you remember?

1           A    That the election was being discussed.

2           Q    Do you remember a topic that the election was stolen?

3           A    I don't recall specifically.

4           Q    Did you ever attend any meetings at the White House, regardless of whether  
5       President Trump was in it, where election-fraud-related allegations were discussed?

6           A    Not that I recall.

7           Q    Do you recall ever hearing about how any members of the White House staff  
8       reacted to hearing about allegations of election fraud?

9           A    I don't recall reactions.

10          Q    Do you recall ever hearing that people were pushing back against claims that  
11       the election had been stolen or rigged?

12          A    I don't recall specific -- specifics of any conversation.

13          Q    Do you have a general recollection of people pushing back?

14          A    I wasn't part of those conversations to have a specific recollection like that.

15          Q    Did you ever hear about it?

16          A    The election was a topic after the election.

17          Q    Right. Understood. But did you ever hear about anyone pushing back  
18       against claims of election fraud in the White House?

19          A    That's so broad. I would need a little bit more specific.

20          Q    Did you ever hear about any meetings where people were pushing back  
21       against claims of election fraud that were being made by President Trump?

22          A    Do you have specific meetings or people?

23          Q    No, I was just asking a general question.

24          A    I generally was not part of those conversations.

25          Q    Did you ever hear about those conversations, even if you weren't a part of

1 them? And I'm not talking about press reports.

2 A Like I said, I answered the phone, and the President held meetings, and he  
3 spoke about many topics.

4 Q Understood. And I know, sometimes, you know, you might not be a part of  
5 a conversation or might not want to be a part of it, but you hear about it anyway. Did  
6 you ever hear about anyone pushing back against claims of election fraud in a meeting  
7 with President Trump?

8 A Do you have a specific meeting in mind?

9 Q No, I don't. It's really just a general question, if you remember that ever  
10 happening after election day.

11 A Not without discussing something more specific.

12 Q Do you have something specific in mind?

13 A A couple memories of this period of time stand out.

14 Q So why don't you just tell us what you remember.

15 A Late sometime in December, there was a meeting that hadn't been  
16 scheduled. It was very last-minute, in the evening. I believe it was a Friday night.  
17 And Sidney Powell, Michael Flynn, and Patrick Byrne came in and had a meeting with the  
18 President. And others from the White House also came in, including Eric Herschmann,  
19 Pat Cipollone, and at one point Derek Lyons. That meeting was long, and I recall there  
20 being a lot of loud speaking and loud conversation.

21 Later, very late in the day, probably almost midnight, the meeting moved upstairs  
22 to the Yellow Oval, and Rudy Giuliani and others came. That meeting stands out  
23 because it was so unusual and a departure from the regularly scheduled day.

24 Q So that meeting, it's been pretty widely reported. I understand that it  
25 happened on December 18, 2020. Does that sound about right?

1           A     If that's what they report. It was a Friday night in December.

2           Q     So you just said that it was, quote, "so unusual." Why was it so unusual, in  
3     your opinion?

4           A     It was unusual that it hadn't been scheduled, that it was very late on a Friday  
5     night. It was my impression that Sidney Powell and those she brought in were  
6     demanding a meeting or time with the President.

7           Q     So you said this meeting was not scheduled.

8           A     Not to my knowledge.

9           Q     When did you learn that Sidney Powell, Mike Flynn, Patrick Byrne, and  
10    maybe others were at the White House demanding a meeting with the President?

11          A     I don't recall if it was in the immediate -- right before they came in, that they  
12    were looking for a meeting. I'm not sure how they got there that night.

13          Q     I'm sorry, and did you say you're not sure how they got -- they actually got  
14    into the White House that evening?

15          A     I don't know how they were in the building, who WAVEd them in, if they had  
16    another meeting or something like that prior to seeing the President.

17          Q     So we understand that one of Peter Navarro's aides, Garrett Ziegler, might  
18    have WAVEd them in. Did you ever hear that?

19          A     I'm not sure if you're referring to a followup that happened a couple days  
20    after that I do understand Garrett WAVEd Patrick Byrne and Sidney in.

21          Q     So, as far as the December 18th meeting goes, you're not sure if Mr. Ziegler  
22    had any role in WAVEing them in.

23          A     I don't know.

24          Q     Okay.

25               Was that the first time that you had seen Ms. Powell at the White House, to the

1 best of your recollection?

2 A No. I recall the first time her being at the White House was election night.

3 Q Do you know whether Ms. Powell made it to the residence on election  
4 night?

5 A Again, she was in the residence, meaning the rooms that weren't part of the  
6 private residence. I recall her being on the -- I believe it's the -- well, there's a ground  
7 floor and the floor above that before you get into the private residence.

8 Q Do you know whether Ms. Powell spoke with President Trump that evening  
9 before he gave his remarks on election night?

10 A I don't know.

11 Q So is it your understanding that Ms. Powell, General Flynn, and Mr. Byrne  
12 came together as a group to the White House on December 18th?

13 A That's my understanding. They walked into the Oval together.

14 Q Did they walk into the Oval by passing you?

15 A They generally were not very kind, and they didn't greet me like, you know,  
16 normal.

17 Q Oh, sorry, and just to clarify, do you mean they just walked right past you  
18 and didn't even stop to say hello or even say they need -- if they had permission to go  
19 inside the Oval?

20 A That was -- that's my recollection.

21 Q We understand that there was also a woman named Emily Newman who  
22 was with Mr. Byrne, General Flynn, and Ms. Powell. Do you remember seeing a woman  
23 who might've been named Emily Newman that evening?

24 A I don't recall there being a fourth person in their group. I don't really  
25 remember that name, but that's kind of a common name.

1           Q     Did they say -- what was your understanding as to why they wanted to meet  
2 with the President that evening?

3           A     It's my understanding they wanted to discuss the election with him.

4           Q     Did you have a more specific understanding than just "discuss the election"?

5           A     The general tone of the meeting was loud. There was a lot of yelling at this  
6 meeting. Others that came, including Eric Herschmann, like I said, Derek Lyons, and Pat  
7 Cipollone, and there was a lot of arguments between those two groups that night.

8           Q     Do you know how Mr. Herschmann became aware of the meeting?

9           A     I don't specifically recall.

10          Q     Do you know whether someone called him to tell him to go to the meeting?

11          A     That could be.

12          Q     How about Mr. Cipollone? Do you know how he became aware of the  
13 meeting?

14          A     I don't recall.

15          Q     How about Mr. Lyons?

16          A     I don't recall.

17          Q     We understand that at some point Mr. Lyons may have been handed a copy  
18 of a prior 2018 executive order. Do you recall if you printed any materials for that  
19 meeting or gave anything to Mr. Lyons for that meeting?

20          A     I don't recall printing for that meeting, but it wouldn't be unusual to print  
21 something during a meeting. I just don't have a recollection of that.

22          Q     Okay. We understand some people participated by phone in that meeting.  
23 Do you recall that?

24          A     I generally recall trying to get people on the phone. I don't specifically  
25 recall who.

1           Q     Mr. Meadows, do you recall him participating or calling him to participate in  
2     the meeting?

3           A     I don't recall specifically, but that doesn't seem unusual.

4           Q     What about Matt Morgan, who we discussed earlier in the day, who was a  
5     campaign attorney? Do you remember if he at any point participated in the meeting by  
6     phone?

7           A     I don't specifically recall that. Again, I just recall attempting or placing  
8     phone calls in to the President.

9           Q     How about Rudy Giuliani? I understand he later attended the residence  
10   portion of the meeting. Do you remember him participating via phone?

11          A     I don't have a specific recollection, but it could be. I do recall him coming  
12   in person much later in the night, close to midnight or something like that.

13          Q     What about Robert O'Brien? Do you remember him coming to the  
14   meeting?

15          A     I don't recall him in person.

16          Q     Do you recall him participating via phone?

17          A     It's possible. I don't specifically recall.

18          Q     So we talked about Sidney Powell coming before to the White House. Do  
19   you remember if that was the first time you had seen Patrick Byrne at the White House?

20          A     That's the first time I recall knowing of that individual.

21          Q     How about General Flynn? Was that the first time in the post-election-day  
22   period that you recall him being at the White House?

23          A     I don't recall if I had seen him prior to that.

1 [4:44 p.m.]

2 BY [REDACTED]

3 Q Did you have any understanding as to how Ms. Powell and General Flynn and  
4 Mr. Byrne may have been working together, or why they would be together in a meeting?

5 A I don't recall knowing that.

6 Q So you said you recalled hearing raised voices. Do you remember which  
7 voices you heard being raised and what they were saying?

8 A At one point, I believe the door was closed, but you -- or I remember hearing  
9 both the voices of Michael Flynn and Eric Herschmann more raised than -- than others, or  
10 there was generally just a lot of noise coming out of the meeting.

11 Q Both when the door was open and when it was closed?

12 A As I recall.

13 Q Do you recall ever hearing President Trump making any comments or saying  
14 anything during the meeting?

15 A I don't recall.

16 Q Do you recall whether he had one of the raised voices?

17 A I don't recall.

18 Q So it's been reported that, during this meeting, Ms. Powell talked about  
19 Dominion voting machines and was making allegations of election fraud relating to  
20 foreign countries, such as Venezuela, Iran, and China.

21 Did you ever hear anything about that?

22 A I didn't recall, or I don't recall hearing her specific arguments about anything.

23 Q Do you -- did you ever hear -- well, it's also been reported that Ms. Powell  
24 proposed declaring a national security emergency as a result of what she believed  
25 happened in the 2020 election. Did you ever hear her say that during the meeting or

1        hear anyone after the meeting say that she proposed that?

2            A     I don't recall the substance of that degree of detail.

3            Q     Did you ever hear that martial law was discussed during this meeting?

4            A     I don't recall.

5            Q     Did you ever hear that seizing voting machines was discussed during this  
6        meeting?

7            A     I don't recall.

8            Q     Did you ever hear that it was -- Ms. Powell wanted to be appointed special  
9        counsel to investigate election fraud claims?   Did you hear that was discussed during the  
10      meeting?

11          A     I don't recall.

12          Q     Okay.   Do you know -- did you ever hear whether President Trump told  
13      anyone to prepare forms that would be needed to effectuate any sort of appointment of  
14      Ms. Powell as a special counsel?

15          A     I don't recall that.

16          Q     Okay.   We understand that White House counsel, including  
17      Mr. Herschmann, stated or indicated that they would resign if Ms. Powell was appointed.

18          Did you ever hear that?

19          A     I don't recall hearing that.

20          Q     Is there anything more specific that you remember about the Oval Office  
21      portion of the meeting on December 18th?

22          A     Not that I recall.

23          Q     Do you remember going in and out -- going into the Oval Office portion of  
24      the meeting at any point on December 18th, maybe to hand someone documents or to  
25      attend to President Trump?

1           A     I don't have a specific memory like that. I -- I know for sure I was not part  
2     of the meeting, but it -- it's not unusual for me to briefly go in and out for something.

3           Q     Do you know why the meeting moved to the residence at a certain point in  
4     the evening?

5           A     I don't recall why.

6           Q     Do you recall if everyone who was in the Oval Office moved to the residence,  
7     or if it was just a certain portion of the participants?

8           A     I recall the addition of Rudy. I recall the majority, if not all -- I'm not  
9     sure -- continuing the meeting upstairs. I was not part of the meeting upstairs in any  
10   way.

11          Q     Do you -- do you recall what time the participants took the meeting to the  
12   residence?

13          A     It was very late. It was probably in the 11 o'clock hour.

14          Q     We understand that Mr. Meadows was at home for a portion of the  
15   meeting, but made it to the residence portion.

16          Do you remember that?

17          A     I don't recall seeing him come in that day or that evening.

18          Q     Do you recall about until when the meeting lasted at the residence on  
19   December 18th?

20          A     Sometime immediately following the moving of the meeting, I went home.  
21   I don't recall knowing when it ended.

22          Q     So, to the best of your recollection, you went home before the meeting  
23   ended?

24          A     Before the meeting upstairs, or just as it was starting upstairs, I went home.

25          Q     Did you ever hear how long the meeting lasted in the residence?

1           A    I don't recall hearing that.

2           Q    We'll show you a couple of documents to see if this refreshes your  
3    recollection related to this meeting. I'll turn to exhibit 63.

4                 And can you see that has a date of December 16th of 2020? And it says:

5                 Presidential Findings to Preserve, Collect, and Analyze National Security Information  
6    Regarding the 2020 General Election.

7                 Do you see that?

8           A    I see that.

9           Q    Have you ever seen this document before? Does it look familiar to you?

10          A    That document is not familiar to me.

11          Q    Do you recall this -- whether this document was discussed in the  
12   December 18th meeting?

13          A    I don't recall anything specifically discussed.

14          Q    Do you recall ever -- this document ever being discussed in any meeting?

15          A    I don't recall.

16          Q    So, if you go to -- you go to page 2, towards the bottom, you can see it  
17   says -- let me know if you can see it. It says: Accordingly, I hereby order: No. 1,  
18   effective immediately, the Secretary of Defense shall seize, collect, retain, and analyze all  
19   machines, equipment, electronically stored information, and material records required  
20   for retention. And it goes forward.

21                 So our understanding, this is a draft executive order that would authorize the  
22   Secretary of Defense to seize voting machines.

23                 Did you ever hear about a draft executive order or otherwise discussions about  
24   authorizing the Secretary of Defense to seize voting machines in connection with the  
25   2020 election?

1           A    I don't recall.

2           Q    So you don't recall ever printing this document or handing it out to anyone  
3       at any point, you know, between November and January?

4           A    I don't recall.

5           Q    Okay. Go to exhibit 64, a very similar document. And this is dated  
6       December 17, 2020, so the -- dated one day after the document we just looked at it.  
7       And it says "Presidential Findings to Seize, Collect, Preserve, and Analyze National  
8       Security Information Regarding the 2020 General Election."

9           Do you -- does this document look familiar to you?

10          A    No, it does not look familiar to me.

11          Q    Do you recall whether this document was ever discussed in a meeting at the  
12       White House?

13          A    I don't recall a discussion like that.

14          Q    So, if we go to page 3, at the top, it says: Accordingly, I hereby order.  
15       And I'll represent to you it's similar to the prior document we just looked at, but it would  
16       authorize the Secretary of Homeland Security to seize voting machines related to the  
17       2020 election.

18           Do you ever -- do you recall ever hearing discussions about authorizing the  
19       Secretary of Homeland Security to seize voting machines in connection with the 2020  
20       election?

21          A    I don't recall that.

22          Q    And so you don't recall whether seizing voting machines was discussed in  
23       that December 18th meeting. Is that right?

24          A    Correct. I don't recall.

25          Q    So, if we go to exhibit 65, it says: Talking Points and Outline, Executive

1 Order No. 13848 on Imposing Certain Sanctions in the Event of Foreign Interference in a  
2 United States Election.

3 Does this document look familiar to you?

4 A From the top or this document I'm looking at, it does not look familiar to me.

5 Q Do you know who drafted this document?

6 A I'm -- I have no knowledge of that.

7 Q And I should have asked. For the prior two documents we looked at, is  
8 it -- the 64 and 63, those draft Presidential findings, do you know who drafted those  
9 documents?

10 A I don't know.

11 Q So this document we're looking at here is exhibit 65. Do you remember  
12 this document ever being discussed in a meeting at the White House?

13 A No, I don't recall that.

14 Q Do you recall ever printing this document and giving it to anyone?

15 A I don't recall.

16 Q Is there anything else -- I know you said that the December 18th meeting  
17 was unusual. Is there anything else that you remember about that meeting that we  
18 haven't discussed today that stands out to you?

19 A No.

20 Q Okay. And I think, before we got into this discussion about the  
21 December 18th meeting, you had said there -- you had a couple of memories where  
22 election fraud allegations were discussed and people pushed back. So the  
23 December 18th meeting seems to be one memory.

24 Do you have other memories where people pushed back?

25 A So there -- that meeting, I recall there being yelling. I recall, a couple days

1 after that meeting, something very unusual happened in that Sidney Powell and  
2 Patrick Byrne were at the White House without an escort seemingly, wandering the White  
3 House and seeking a meeting with the President that was entirely unexpected by  
4 everyone.

5 Q And do you recall about what time of day this was?

6 A I believe it was a Sunday evening.

7 Q Oh, on a weekend?

8 A It was -- the meeting that I just explained was a Friday, and this was a couple  
9 days later, this Patrick Byrne and Sidney unauthorized at the White House.

10 Q Was General Flynn with them?

11 A My recollection is just Sidney Powell and -- and Patrick Byrne.

12 Q And what was your understanding as to why they were at the White House  
13 that evening on that Sunday, which I think would be around December 20th?

14 A It was my understanding they were seeking a meeting with the President.

15 Q Do you know why they wanted to meet with the President?

16 A I -- I don't specifically recall.

17 Q Did anyone ever tell you what they -- why they wanted to meet with the  
18 President?

19 A As a -- as a pattern, if someone wanted a meeting, sometimes they would  
20 share with me. I don't specifically recall that -- why they wanted a meeting. I could  
21 assume it was a follow up to the meeting 2 days prior.

22 Q But you don't have a specific recollection if -- if it was?

23 A I don't remember knowing that right now.

24 Q And I believe you said a few minutes ago that it was your understanding that  
25 Mr. Ziegler WAVEd in Ms. Powell and Mr. Byrne for this second meeting, this

1       December 20th. Or I should say it wasn't a meeting, but WAVEd them in to get into the  
2       White House. Is that right?

3           A     Yes. That was what I later understood to have been the way they got to  
4       the White House.

5           Q     So did -- and pardon my ignorance, but is Mr. Ziegler -- he had the kind of  
6       role where he would be able to WAVE people into the White House?

7           A     I don't remember knowing that person before finding out he had done that.

8           Q     Do you recall who told you that Mr. Ziegler WAVEd them in?

9           A     I don't recall.

10          Q     Okay. Do you know whether -- do you recall whether Ms. Powell and  
11       Mr. Byrne did meet with President Trump that evening on December 20th?

12          A     I don't believe they did.

13          Q     Do you know why not?

14          A     The President was not taking meetings that night.

15          Q     Did you ask President Trump if he would take a meeting with Ms. Powell and  
16       Mr. Byrne?

17          A     I recall generally asking him, yes.

18          Q     And do you recall what he said in response?

19          A     His general response was he's not going to see them that night.

20          Q     Do you recall if he said why not?

21          A     I don't recall.

22          Q     Did you tell anyone that the President said he was not going to meet with  
23       Ms. Powell and Mr. Byrne that evening?

24          A     Yes. The -- the documents -- the text messages that my lawyer submitted is  
25       reflective that I shared with some of my colleagues. I don't specifically recall sharing at

1       that time with anyone else, but I may have.

2           Q     And were those text messages, I believe, with Johnny -- John -- Mr. John  
3       McEntee and Mr. Scavino?

4           A     And Nick Luna.

5           Q     Okay. Did you -- do you know who told Mr. Byrne and Ms. Powell that they  
6       would not be meeting with the President that evening?

7           A     I believe I shared that with Sidney Powell.

8           Q     Do you recall her response?

9           A     I don't recall how I told her, whether it was email or phone. I do recall in  
10      this thread that there is an email that indicates she understood she wasn't going to see  
11      him that night.

12          Q     So you don't really -- you don't specifically recall how she reacted to that  
13      information, whether it was over the phone or in person, that you told her she would not  
14      be meeting with the President that night?

15          A     I was not -- I was not there that night. I did what I did from my home.

16          Q     Okay. Do you know whether they went home after that, or if they stuck  
17      around at the White House?

18          A     After they were initially told that they wouldn't be seeing the President that  
19      night, later I received a phone call from the usher's office, which is situated between the  
20      residence and the private residence, and I got a phone call sometime later that night  
21      indicating that a group of people were walking up the stairs separating the residence  
22      from the private residence, and the ushers asked them to wait, and I was one of their  
23      phone calls.

24          Q     And what did you tell the ushers?

25          A     I shared with them that the President had indicated he wasn't going to see

1 them that night.

2 Q And do you recall if they left after -- after that?

3 A That was, I believe, my last interaction with them. I don't know if they  
4 were escorted out or how they left after that.

5 Q Do you know how they would get to that -- to that portion of the White  
6 House, you know, after being initially told they were not going to meet with  
7 President Trump, how they could continue to stay on the premises and -- and make it up  
8 the stairs?

9 A That's part of the reason why I remember it. It was so absurd that they got  
10 that far.

11 Q Do you recall, after this happened, whether there were any meetings about,  
12 you know, that this happened? Seems like kind of a concerning event that people would  
13 be wandering around the White House trying to meet with the President after being told  
14 they weren't going to.

15 A I don't recall a specific meeting. I believe they were or one -- one of them,  
16 or their whole group was put on a list indicating that they wouldn't be able to return to  
17 the White House. So the front gate was notified they weren't going to be admitted.

18 Q I apologize. I missed a bit of that. Did you say that you think they were  
19 put on a list?

20 A I think, as a result of that meeting, that they were put on a -- a list that  
21 would stop their entrance.

22 Q And, to the best of your memory, would that have been Ms. Powell and  
23 Mr. Byrne?

24 A I don't remember, but I believe it was Sidney and potentially Byrne as well.

25 Q Do you know who helped -- who -- who helped get them on that list, or who

1       was involved in the effort to get them on the list so they wouldn't get into the White  
2       House after that?

3           A    That authority came from the deputy chief of staff for operations, Tony  
4       Ornato.

5           Q    Did -- do you remember telling Mr. Ornato what happened with Ms. Powell  
6       and Mr. Byrne on the 20th?

7           A    I don't recall a specific conversation with him. I believe we probably  
8       discussed any remaining detail about it later.

9           Q    Do you ever recall discussing with President Trump what had happened?

10          A    No. I don't recall a conversation like that.

11          Q    Do you know whether it was -- whether anyone else discussed with  
12       President Trump what had happened with Ms. Powell and Mr. Byrne?

13          A    Not to my knowledge.

14          Q    Do you know whether Mr. Byrne or Ms. Powell met with President Trump  
15       after December 20th and -- until, you know, the end of the administration, I'll say  
16       January 20, 2021?

17          A    I don't recall if they had any meetings after that.

18                 [REDACTED] Anything?

19                 [REDACTED] No.

20                 [REDACTED] Let's go to exhibit 31. So we're going back to November, so  
21       apologies for going back in time a bit.

22          Mr. Benson. Can you just pardon me? Can I just interrupt for a moment?  
23       It's --

24                 [REDACTED] Yes.

25          Mr. Benson. -- after 5, and do you have any -- do you have an idea of how much

1 longer we have?

2 [REDACTED] This -- we can go off the record briefly. And so we're off the  
3 record.

4 [Recess.]

5 [REDACTED]. So let's go back on the record. It's 5:20 p.m. eastern time.

6 BY [REDACTED]:

7 Q Let's go to exhibit 33.

8 And can you see that, Ms. Michael?

9 A I can see the text. I can't see above the line.

10 Q So, at the top, it's from William -- and I don't know if it's Levi or Levi --

11 Mr. Benson. Can you scroll up? Pardon me. Can you scroll up, please? We  
12 can't see the top. Scroll -- no. Scroll the other way. Thank you.

13 BY [REDACTED]

14 Q Do you see that? It's a November 19, 2020, date at the top on exhibit 33?

15 Do you see that?

16 A Yes.

17 Q Okay. And, at the bottom, the initial email looks like you sent an email on  
18 November 19, 2020, at 1:30 to -- I believe it's Levi. I don't know if that's -- if I'm  
19 pronouncing his name correctly. But you say: Hi, Will. The President would like the  
20 AG and DAG to watch this press conference live on FOX now, but also two links below.  
21 And you provide a link to a Twitter -- looks like a Team Trump, status, and a You Tube link.

22 Do you remember sending this email to Mr. Levi?

23 A I don't recall sending that email.

24 Q Okay. Do you know Mr. Levi?

25 A I know him as a chief of staff over at DOJ.

1           Q     And was he chief of staff to Bill Barr?

2           A     Yes.

3           Q     And do you remember, in the November 3rd to January 6, 2020 -- 2021 time  
4 period, sending emails like this to Mr. Levi?

5           A     Looking at this email, I have no reason to doubt that came from me. I don't  
6 recall additional emails beyond what I'm looking at right now as from me.

7           Q     So you -- you say the President would like the AG and DAG to watch this  
8 press conference.

9           Do you recall what press conference that was?

10          A     I don't recall. I -- I don't recall.

11          Q     So we understand that Mr. Giuliani and Ms. Powell, among others, gave a  
12 press conference at the RNC in Washington, D.C., on that day.

13          Does that refresh your recollection as to the press conference that you may have  
14 been referring to in that email?

15          A     I do recall that press conference, yes.

16          Q     Okay. And do you recall the President asking you to send an email to  
17 Mr. Levi or anyone at the Department of Justice notifying them that this press conference  
18 was taking place?

19          A     No, I don't recall that. It looks like the President asked me to do that, and I  
20 did.

21          Q     And I think you had mentioned this earlier, but would the President  
22 frequently tell you -- you know, dictate to you emails to send to other people on his  
23 behalf?

24          A     I don't recall the frequency, but yes, he would dictate language and  
25 attachments that he would like to be sent to certain people, and I did.

1           Q     Okay. So would this be an example of that to the best of your recollection?

2           A     Yes.

3           Q     Okay. So, here, there is a Twitter.com, slash, Team Trump status, and I'll  
4 represent to you the link is dead, so we can't actually access it anymore. And there is a  
5 You Tube link.

6                 Just generally, would President Trump tell you, like, the specific links to send to  
7 folks, or would -- would it be your job to track them down?

8           A     It would generally be that the President referred to something happening,  
9 like a press conference, and then I -- he wasn't aware of the exact You Tube link where it  
10 came from, and either I or I would ask someone to help me find that link to send.

11          Q     And did you say you don't specifically recall him asking you to send these  
12 links for the AG and the DAG to watch on November 19th?

13          A     I -- I don't recall this email.

14          Q     Do you recall President Trump ever telling you why he wanted the Attorney  
15 General and Deputy AG to watch the press conference?

16          A     I don't recall the substance of what he told me other than what I'm looking  
17 at this email indicates to me he asked me to send it, and it looks like I did.

18          Q     Did you have any involvement in that press conference at the RNC on  
19 November 19th?

20          A     No. I -- I remember that it happened. That was my involvement. I saw  
21 it on TV.

22          Q     Okay. Did you watch it live?

23          A     I believe, if I wasn't watching it live, I later saw clips of it for -- or a  
24 substantial portion of it.

25          Q     And do you recall whether President Trump watched this press conference?

1           A     I -- I don't know if he watched it live or not.

2           Q     So we understand Ms. Powell, during this press conference, made various  
3     claims specifically about the Dominion voting machines and how she believed they were  
4     created in Venezuela at the direction of Hugo Chavez, former President of Venezuela.  
5     And she also claimed that the Dominion machines used Smartmatic software that flipped  
6     Trump votes to Biden votes.

7                  Do you ever recall hearing those allegations during the 2020 election or  
8     specifically with this press conference?

9           A     I remember generally that Sidney spoke at the conference. I couldn't  
10    summarize what she said.

11           Q     So we understand from witnesses that, after this press conference,  
12    Ms. Powell was asked to produce evidence to back up some of the claims that she made,  
13    and she refused to do so.

14                  Did you ever hear that?

15           A     I don't recall hearing that.

16           Q     Do you know whether President Trump ever asked to see evidence to  
17    support any of the claims that Ms. Powell made during this press conference or at any  
18    other time?

19           A     I don't recall.

20           Q     Turn to exhibit 46.

21                  Let me know if you can see it. It's a December 14, 2020, email at the top. But if  
22    we go down a bit, the first email -- a little bit up -- is from Sidney Powell to you,  
23    Ms. Michael, earlier in the day on December 14th.

24                  Can you see that?

25           A     Yes.

1           Q     Okay. And she sends you a link, and if you go up on the email and see that  
2 the attachment is Antrim County Forensic Report.

3           Do you remember receiving this link or a document from Ms. Powell relating to  
4 Antrim County?

5           A     No, I don't recall receiving that email.

6           Q     Do you recall ever receiving any emails from Ms. Powell?

7           A     I recall that she would communicate over email. I don't recall specific  
8 emails. I have no reason to doubt this is an email from her to me, though.

9           Q     Okay. Do you -- do you have any understanding as to why she sent you this  
10 report from Antrim County?

11          A     I can assume she wanted this information shared with the President.

12          Q     Do you recall whether you shared this information with the President?

13          A     I don't recall.

14          Q     As your normal practice, would -- would you share things from -- from  
15 Ms. Powell that she sent to you with the President during this time period?

16          A     As a general practice, I would share information like this related to the  
17 election -- as instructed to me by Eric Herschmann, this appears to be something that I  
18 may have sent -- it strikes me as something I would have sent to Eric Herschmann.

19          Q     And why do you say that?

20          A     Because it was made clear to me by Eric that information related to the  
21 election coming from certain people, that I needed to send it to him.

22          Q     And who were those certain people that you were to send election  
23 information to Mr. Herschmann?

24          A     People like Sidney.

25          Q     Okay. Who else besides Sidney?

1           A     There was a -- just a general sense of people that had come in after the  
2 election that were new. I could list a couple. I couldn't list them in their entirety.

3           Q     Who were -- who were the other couple that you could list, understanding  
4 that it's not exhaustive?

5           A     I would list people like Cleta Mitchell and Kurt Olson.

6           Q     Did Mr. Herschmann tell you why he wanted to receive those documents  
7 from those people?

8           A     No. Not that I recall.

9           Q     When Mr. Herschmann asked you to do that, did he mean that you then  
10 would not share also with President Trump, just to give it to Mr. Herschmann?

11          A     I understood that, giving it to Mr. Herschmann, that then he would -- he  
12 would figure out what to do with it.

13          Q     Do you recall whether there is anything specifically that prompted  
14 Mr. Herschmann to -- to say this to you?

15          A     I don't recall a specific instance.

16          Q     Do you recall: Were you getting a lot of emails from new people, and this  
17 was a way to manage your inbox, or was there any explanation given to you?

18          A     Eric Herschmann was a lawyer. That's all I needed to know.

19          Q     Okay. Did you ever tell President Trump that Mr. Herschmann had told you  
20 this?

21          A     I understood that Eric would take care of whatever needed to be done with  
22 the document, including if he needed to tell the President.

23          Q     Do you recall about when Mr. Herschmann asked you to, you know, route  
24 documents to him from people like Ms. Powell, Ms. Mitchell, and Mr. Olson?

25          A     Sometime in -- in the -- after -- after the election.

1           Q    So sometime after November 3rd?

2           A    Yes.

3           Q    Do you -- could you be more specific if it was November or December or --

4           A    I don't recall the period of time. I distinctly remember that that was what  
5       he indicated I do.

6           Q    In terms of the people like Ms. Powell, do you know if Mr. or Dr. Eastman fell  
7       into that bucket of, you know, sending things to Mr. Herschmann, if you received  
8       something from Dr. Eastman?

9           A    Yes, he would fall in that bucket.

10          Q    So, if you would receive documents from Professor Eastman, was it your  
11       general practice to forward them on to Mr. Herschmann?

12          A    Eric, and sometimes the chief of staff is my recollection.

13          Q    When would you also include Mr. Meadows in the forwards?

14          A    I don't recall having a reason.

15          Q    How about Mr. Giuliani? Is he someone that you would -- if you received  
16       documents or an email from Mr. Giuliani or an associate of his, like Ms. -- I think it's Maria  
17       Ryan -- would you forward those to Mr. Herschmann as well?

18          A    That sounds like something I probably did.

19          Q    We understand that one of Mr. Giuliani's associates is a former police  
20       commissioner named Bernard Kerik. Would he fall in that bucket as well?

21          A    I assume -- I believe that sounds like something I would do.

22          Q    I think ██████████ mentioned a Katherine Friess or Friess earlier. Is she  
23       someone, if you received anything from her, you would forward it to Mr. Herschmann as  
24       well?

25          A    I don't have a specific recollection of that, but it sounds like I -- I may have

1       done that.

2           Q   And you said Kurt Olson. He was another one?

3           A   Yes.

4           Q   Okay. Is there anyone else that you can remember, sitting here today, if  
5   you received emails from them, you would forward them on to Mr. Herschmann?

6           A   I don't know for a fact that's an exhaustive list. There may be others.

7           Q   But, sitting here today, you can't recall any other names?

8           A   Not right now.

9           Q   Okay. What if you received -- did you ever receive phone calls from any of  
10   these individuals, you know, between November 3rd and -- 2020 and January 6, 2021?

11          A   I believe some of those individuals, yes, I received phone calls from.

12          Q   Would you similarly have to tell Mr. Herschmann if they had called, or did  
13   that, you know, sharing the information only apply to emails?

14          A   I specifically remember this applying to emails. I don't specifically  
15   remember this applying to phone calls.

16          Q   You had mentioned a Cleta Mitchell. What's your understanding of who  
17   Ms. Mitchell is, what -- what her -- how she came into -- into your orbit at the White  
18   House?

19          A   I understood her to be a lawyer. I understood her to have been introduced  
20   to the President by Mark Meadows.

21          Q   Do you recall about when that introduction happened?

22          A   I don't specifically recall.

23          Q   And do you -- do you know why she was introduced to the President by  
24   Mark Meadows?

25          A   I don't know why.

1           Q     Do you know whether Ms. Mitchell was working on any  
2 election-fraud-related work in the post-election-day period?

3           A     I generally understood that to be the topic she was interested in.

4           Q     Do you recall any meetings Ms. Mitchell had with the President  
5 in -- between November and January 2021?

6           A     I don't specifically remember her coming to the Oval. I generally  
7 remember her calling.

8           Q     Her calling in to speak with who?

9           A     The President.

10          Q     And would you typically connect her to the President if -- if he was available?

11          A     Yes. I recall informing the President when she called.

12          Q     If we go back to exhibit 46.

13          So we -- you -- later in the day, if you go up a bit, you forward this Antrim County  
14 Forensic Report to Mr. Nick Luna, Austin -- and Austin Ferrer.

15          Do you recall why you forwarded this to Mr. Luna and Mr. Austin Ferrer?

16          A     I don't specifically recall that. I could assume I meant potentially -- I don't  
17 know what I'm -- would mean by that.

18          Q     And did you say you -- you recalled giving this -- and we can -- actually, we'll  
19 show you the report if you go to the attachment so you can see the front. Maybe it will  
20 refresh your recollection.

21          Do you see a document, it says "Allied Security Operations Group"?

22          A     Yes. I see just the top through, it looks like, paragraph 1.

23          Q     Okay. Do you recognize this document?

24          A     No. I don't recognize this document.

25          Q     Do you ever -- do you recall ever discussing this document with the

1 President?

2 A I don't recall.

3 Q Do you recall the President ever talking about a report relating to Antrim  
4 County, Michigan, or a report from Allied Security Operations Group, which is also known  
5 as ASOG?

6 A I don't recall.

7 Q Okay. So -- and I believe we shared these documents to you in advance.  
8 We see that you sent this -- this report -- this Allied Security Operations Group report to  
9 various individuals, including at the Department of Justice and the Department of  
10 Homeland Security, and then elected officials in Michigan, Georgia, Arizona, Pennsylvania,  
11 and Wisconsin.

12 Do you -- do you generally remember sending this report to a large, you know,  
13 number of individuals?

14 A I don't recall the mechanics of sending this specifically. I, as I said, would  
15 do things at the direction of the President. If we want to go through the emails, but I -- I  
16 sent things at the direction of the President.

17 Q Okay. And -- let's see. And you don't specifically recall why -- why you  
18 sent this document to -- to various individuals around December 14th. Is that right?

19 A I do not recall why. I can assume what I did was at the direction of the  
20 President.

21 Q And I'll just show you one of them. If we go to exhibit 47. This is just one  
22 of the examples. If you go down a way, you'll see an email from you to  
23 Mr. Christopher Michel, I believe.

24 Do you see that, December 14, 2020?

25 A Yes, I see that.

1           Q     So you see from POTUS -- that's the subject:  Hi, Chris.  POTUS wants the  
2     AG to take a look at the attached documents.

3                 And, if we look at the attachments, I'll represent to you it's that same report and  
4     then also talking points related to the report.

5                 Do you remember sending this to an individual at the -- at the DOJ?

6           A     I'm not familiar with that person's name.  I don't specifically recall sending  
7     that.  But, looking at that email, it's clear to me I was doing that at the direction of the  
8     President.

9           Q     So there is -- looking at this email -- and, like I said, I'll represent to you, you  
10    sent this to various individuals at the government and then in different States.  You  
11    don't remember anything about why you sent this report to various individuals on  
12    December 14th?

13          A     I don't recall the circumstances surrounding that other than it looks like I'm  
14    doing that at the direction of the President.

15          Q     And would the President tell you the specific individuals to send a document  
16    to?

17          A     Yes.

18          Q     Okay.  So he might say, you know, send it to X person at DOJ, send it to this  
19    person at DHS, this person in Michigan, something like that, and then you would put  
20    together the emails?

21          A     Yes.

22          Q     Would you have to show him a draft of the email before you sent it?

23          A     No.

24          Q     Okay.

25          A     Not that I recall.

1           Q     So, once he gave you the direction, you would just go and send the emails?

2           A     Yes.

3           Q     And so it sounds like it's a fairly regular occurrence, you would be sending  
4 documents on behalf of the President to different people?

5           A     Yes. Regular.

6           Q     Regular. Okay.

7           I'm going to turn to exhibit 66.

8           And, if we zoom out a bit, this is -- it's a tweet from President Trump. And I'm  
9 not sure if you can see the bottom of the tweet. It's at -- from December 19th. I think  
10 we have a -- the exhibit stamp, so it might be hard to read, but I'll represent to you it's  
11 from December 19, 2020, at 1:42 in the morning, eastern time.

12           So this would have been after that meeting we discussed with Ms. Powell,  
13 Mr. Byrne, and General Flynn that occurred on December 18th.

14           And the tweet reads: Peter Navarro releases a 36-page report alleging election  
15 fraud, more than sufficient to swing victory to Trump, provides a link, a great report by  
16 Peter. Statistically impossible to have lost the 2020 election. Big protest in D.C. on  
17 January 6th. Be there, will be wild.

18           Do you recall seeing this tweet?

19           A     Like I said, I didn't have Twitter. If this was reported on the news, I likely  
20 saw it. I don't remember seeing it at the time.

21           Q     So, as I mentioned, this is from December 19th. It's really early in the  
22 morning, 1:42 a.m.

23           Do you know whether there is any connection between this tweet and the  
24 meeting that happened with General Flynn, Ms. Powell, and Mr. Byrne, among others,  
25 the night before?

1           A    I'm not aware of a connection.

2           Q    Do you know whether January 6th was discussed during that meeting on  
3   December 18th with Ms. Powell, General Flynn, and others?

4           A    I don't recall hearing anything specific discussed.

5           Q    So, in this tweet, President Trump says: Big protest in D.C. on January 6th.

6           Do you recall whether you were aware that a big protest was happening in D.C. on  
7   January 6th, you know, as of December 19, 2020?

8           A    I don't recall the day that I was aware that that was something the President  
9   would attend. If it was sometime in the weeks prior to that, then it would have  
10   appeared on the President's schedule, which I reviewed.

11          Q    So is it your recollection that you learned of the -- of a rally in D.C. when it  
12   was on President Trump's schedule?

13          A    I generally learned about events that the President would attend on the  
14   President's schedule. I don't specifically remember being told or learning about this  
15   event other than the usual way I did.

16          Q    Okay. In the tweet, President Trump says: Be there, will be wild.  
17          Do you have any understanding as to what President Trump meant that the  
18   protest would be wild?

19          A    I'm not aware what he meant by that.

20          Q    Do you know if anyone helped President Trump prepare this tweet?

21          A    I don't know.

22          Q    And did you say -- was it your testimony earlier that Mr. Scavino was  
23   someone who -- who would work with President Trump on -- on his tweets?

24          A    On some of them, that's correct.

25          Q    Did -- to the best of your knowledge, did Mr. Scavino have access to

1 President Trump's Twitter account?

2 A Yes. To the best of my knowledge, he had access.

3 Q Do you know whether anyone else did aside from Mr. Scavino?

4 A I don't know anyone else that did.

5 Q Okay. But you're not sure who prepared this specific tweet. Is that right?

6 A Correct.

7 Q So this tweet mentions a report from Peter Navarro, and I -- and I -- earlier  
8 today, maybe this morning, we discussed Peter Navarro and his reports a bit.

9 Do you know why Mr. Navarro was working on a report related to the 2020  
10 election?

11 A I don't know why.

12 Q Do you know whether President Trump ever asked Mr. Navarro to -- to  
13 prepare a report or to look into the 2020 election?

14 A I don't recall hearing that.

15 Q Do you recall whether you saw any drafts of any of the reports prepared by  
16 Mr. Navarro before they were published?

17 A I don't recall seeing drafts.

18 Q And do you recall ever President Trump having meetings with Mr. Navarro to  
19 discuss his reports?

20 A I don't know the contents of the discussions. This tweet indicates the  
21 President was aware of that report.

22 Q But do you recall them having any meetings about the reports -- about  
23 Mr. Navarro's reports?

24 A Peter, as an assistant to the President, could come into the Oval whenever  
25 he wanted. I recall he used that privilege. I don't recall the substance of his meetings.

1           Q     So we're -- do you -- we're aware of a meeting on December 21st that  
2 involved President Trump, Vice President Pence, and various Members of Congress,  
3 mainly from the Freedom Caucus.

4           Do you have a recollection of -- of a meeting around that time period involving  
5 those people?

6           A     You said the date was December --

7           Q     21st, 2020.

8           A     I don't recall that meeting.

9           Q     Okay. Do you recall a meeting -- and I understand it was in person -- with  
10 Representatives Biggs, Mo Brooks, Gaetz, Gohmert, Gosar, Representative-elect Greene,  
11 Jordan, Hice? That sound familiar to you?

12          A     Not as it relates to a specific meeting. Those names and people were  
13 known to me and known to the President.

14          Q     Okay. So we understand, during this meeting, part of the -- part of the  
15 meeting was to discuss challenging electoral votes from certain States, specifically  
16 Arizona, Georgia, Michigan, Nevada, Pennsylvania, and Wisconsin.

17          Did you ever hear a meeting where it was discussed to challenge electoral votes  
18 related to the 2020 election?

19          A     I don't recall.

20          Q     Okay. Do you otherwise remember any -- any meetings involving  
21 President Trump and Members of Congress relating to January 6th and the joint session?

22          A     I generally recall Members of Congress would meet with the President in this  
23 time period and others. I don't know the topics of those conversations.

24          Q     So you don't remember any -- any specific meeting involving those Members  
25 of Congress, President Trump, and Vice President Pence, sitting here today?

1           A    I don't recall.

2           Q    Do you recall any meetings with Members of Congress where Vice President  
3         Pence's authority on January 6th was discussed?

4           A    I don't recall.

5           Q    I'll quickly turn to exhibit 69.

6           If we go down a bit so you can see the cover of the email or -- excuse me -- the  
7         document. It says: A Report on Dominion Voting Systems, The 2020 Presidential  
8         Election.

9           Do you recognize this document?

10          A    Looking at this cover page, I -- I don't recognize that.

11          Q    Okay. Do you remember ever printing this out or handing this document  
12         out to -- to individuals in the White House?

13          A    I don't have a specific recollection of that, just looking at the cover page.

14          Q    Do you recall any meetings specifically about Dominion voting machines  
15         between November 2020 and January 2021?

16          A    I was not part of a meeting like that that I recall, and I don't recall hearing  
17         that from a meeting.

1 [5:51 p.m.]

2 BY [REDACTED]

3 Q I believe earlier this morning you had referenced that you specifically  
4 recalled a call involving the secretary of state of Georgia. Is that right?

5 A Yes.

6 Q What do you remember about that call?

7 A I remember that call, logically, came together the day before it happened.  
8 I recall Mark Meadows instructing me who needed to be on the call.

9 Q And do you recall who Mr. Meadows told you needed to be on the call?

10 A He gave me a list of a few people, Raffensperger being one of them.

11 Q Do you recall any other names?

12 A This is another one I -- it's hard to separate from the reports that came out  
13 later. I know Cleta was on that call. I don't know if I knew that prior or from the media  
14 reports.

15 Q Did you have any understanding as to who wanted to have this call with  
16 Mr. Raffensperger?

17 A My understanding came from Mark Meadows, in that the call was set  
18 up -- communicated to be set up from him. That's all I understood.

19 Q Okay.

20 So it's been reported that, between election day and the day of that call, which I  
21 believe was January 2, 2021, people from the White House -- and I don't know if it was  
22 one person or multiple -- had attempted to contact the Georgia secretary of state at least  
23 18 times.

24 Do you recall prior to January 2d, ever calling the Georgia secretary of state,  
25 personally or that office?

1           A    I don't recall specifically.

2           Q    Do you know -- did you ever hear that people at the White House were  
3         trying to get in touch with the Georgia secretary of state?

4           A    I don't recall.

5           Q    Do you recall having any involvement in making calls prior to January 6th to  
6         the Georgia secretary of state?

7           A    Beyond what you've indicated happened on the 2nd of January, I don't  
8         remember another call.

9           Q    So it's been reported that you personally left a voicemail on the media line  
10       for the office of the Georgia secretary of state on January 2nd. Is that the call that you  
11       can remember? It relates to a voicemail you left earlier in the day?

12          A    Maybe. The call that I remember is a larger call that was connected by the  
13       White House operator that included Cleta and Mark and Raffensperger and others.

14          Q    Do you recall leaving a voicemail at the office of the Georgia secretary of  
15       state on January 2nd?

16          A    I don't recall that.

17          Q    Aside from President Trump and Mr. Meadows, do you recall if there was  
18       anyone else from the White House who participated in the call with Mr. Raffensperger on  
19       January 2nd?

20          A    I don't know.

21          Q    And did you have any understanding as to why Mr. Meadows or President  
22       Trump wanted to have a call with Mr. Raffensperger on January 2nd?

23          A    I don't recall.

24          Q    Did you participate in the call on January 2nd with Mr. Raffensperger?

25          A    Not that I recall.

1           Q     Would you have connected the call or played any role in that call, or were  
2     you just -- what was your involvement?

3           A     If we're referring to the same call, that was a very large -- you know, a larger  
4     call that was reported by the media. That call is the only call I remember, and that call  
5     was connected by the White House operator.

6           Q     Okay. So you don't recall participating in that call?

7           A     No.

8           Q     Okay. Do you know what was discussed during that call?

9           A     I don't know. Later, there was a media report that had a transcript of sorts.

10          Q     Okay. Do you remember after the call ever discussing with Mr. Meadows  
11        or President Trump what was discussed during that January 2nd call with  
12        Mr. Raffensperger?

13          A     No, I don't recall conversations about that.

14          Q     Did you ever hear about how that call went with Mr. Raffensperger from  
15        anyone in the White House?

16          A     I don't recall.

17          Q     Are you aware of any other outreach by President Trump with any other  
18        secretaries of state between election day and January 20, 2021?

19          A     I don't recall.

20          Q     And I believe you'd mentioned an example of Governors; it was a general  
21        example of people you might've sent emails to. Do you remember sending an email to  
22        the Governor of Arizona related to the 2020 election?

23          A     I recall having Governors' email addresses. I recall the President indicating  
24        he wanted things sent to Governors at different times. I don't have a specific memory  
25        of that to Governor Ducey.

1           Q     So that was the next question. You don't have a specific recollection of any  
2     emails you might have sent to Governor Ducey?

3           A     Correct.

4           Q     How about Governor Kemp of Georgia?

5           A     Again, I don't have a specific memory of sending documents to him.

6           Q     And I believe we had talked some earlier today, an email with State Senator  
7     Mastriano. Do you remember emails to Mr. Chatfield, Mr. Shirkey of Michigan about  
8     the 2020 election?

9           A     I generally remember those people were from Michigan and that the  
10   President had corresponded with them over the phone and/or email through me.

11          Q     And is it your understanding those conversations were generally about the  
12   2020 election?

13          A     That was my general understanding.

14          Q     Do you know how President Trump became aware of Mr. Shirkey or  
15   Mr. Chatfield of Michigan?

16          A     I don't recall how they were introduced.

17          Q     How about Mr. Mastriano? Do you know how he was introduced to  
18   President Trump?

19          A     My first memory of that introduction was what we already discussed, the  
20   night that he and a larger group came in.

21          Q     So that's the first recollection that you have of Senator Mastriano interacting  
22   with President Trump?

23          A     Correct.

24          Q     Are there any other State representatives who you remember having  
25   meetings or discussions with President Trump post-election-day to January 20, 2021?

1           A   Not that I recall.

2           Q   Do you remember someone from Pennsylvania named Bryan Cutler?

3           A   I vaguely recall that name.

4           Q   Do you recall him having meetings or phone calls with President Trump in  
5   the post-election-day period?

6           A   I can't say for certain if he had a meeting or a phone call.

7           Q   So we understand he might've met with President Trump while he was in the  
8   White House for a Christmas tree lighting. Does that refresh your recollection?

9           A   I don't recall that.

10          Q   Are you familiar with a Member of Congress named Scott Perry from  
11   Pennsylvania?

12          A   Yes.

13          Q   Do you recall whether he had meetings with President Trump related to the  
14   2020 election in the post-election-day period?

15          A   I don't recall the contents or the topic. I do recall he had at least a meeting  
16   with the President.

17          Q   Do you know how when President Trump was introduced or how he became  
18   aware of Representative Perry?

19          A   I don't recall the beginning of their introduction.

20          Q   Are you familiar with a former official at the Department of Justice named  
21   Jeff Clark?

22          A   Yes.

23          Q   And who is Jeff Clark?

24          A   He -- the name was mentioned to me, if I recall, the first time from Scott  
25   Perry. I recall that he requested a meeting with the President and Jeff Clark.

1 Q Do you recall about when that was?

2 A November or December. I don't know.

3 Q Do you recall whether Representative Perry told you why he wanted to have  
4 a meeting with the President and Mr. Clark?

5 A I don't recall.

6 Q Do you recall whether that meeting happened?

7 A Yes, I believe that meeting happened.

8 Q Do you know what was discussed during that meeting?

9 A No, I don't recall.

10 Q Do you know whether anyone else participated in that meeting besides  
11 President Trump, Representative Perry, and Mr. Clark?

12 A I don't recall.

13 Q Okay. Do you recall President Trump having other meetings with Mr. Clark  
14 in the post-election-day period?

15 A I don't specifically recall additional meetings.

16 Q Do you recall if you ever learned how Mr. Perry knew -- or Representative  
17 Perry knew Mr. Clark?

18 A I don't believe that connection was made to me.

19 Q Do you know whether, during that meeting with Mr. Clark and  
20 Representative Perry, whether they discussed with President Trump the 2020 election?

21 A I don't know what was discussed in that meeting.

22 Q Okay.

23 [REDACTED] Do you have anything on that?

24 [REDACTED] No.

25 [REDACTED] Thank you for your patience, Ms. Michael. I have just a couple of

1 wrap-up questions that came to mind from things that we talked about earlier today, and  
2 then we will let you get back to your regularly scheduled life.

3 BY [REDACTED]

4 Q So we talked a fair bit about the days leading up to and including January  
5 6th. You told us that you remembered placing a lot of calls for the President. You  
6 remembered a few of them for us.

7 I wanted to ask you, do you remember ever making phone calls to the Willard  
8 Hotel during that time period?

9 A No, I don't recall that.

10 Q Okay. We have information that we've developed and it's also been  
11 publicly reported that the Willard Hotel was a, sort of, base of operations for individuals,  
12 some of whom, you know, purported or claimed to be working on a legal team for  
13 President Trump and other supporters in the days leading up to January 6th.

14 Does that ring a bell for you?

15 A The recent reports of that is the first time I recall hearing the name "Willard  
16 Hotel."

17 Q Okay. So, at the time, before January 6th, did you ever have any reason to  
18 understand that there were individuals that the President might have wanted to speak to  
19 who were at some points together in the Willard Hotel?

20 A Not that I recall.

21 Q Okay.

22 I also wanted to ask you -- earlier, we showed you a text message exchange  
23 between you and Nick Luna on January 6th. I can pull it up if you want. But there was  
24 one detail I forgot to ask you about.

25 When you were telling Mr. Luna that you were about to come into the White

1 House, you texted him that somebody named Aaron was going to come in with you.

2 And I was just wondering who Aaron is.

3 A That's my husband.

4 Q Got it. Did he, in fact, come with you to the White House on January 6th?

5 A Yes, he did.

6 Q Okay. And what did he do during the day while he was there and you were

7 working?

8 A He, I recall, was in the EOB that afternoon.

9 Q Got it. Did he also work for the administration?

10 A He worked for a different department in the administration.

11 Q Understood. So he was -- is it fair to assume he was in his own office that

12 day?

13 A He didn't have an office in that building, but he was familiar with people that

14 worked there.

15 Q Got it. Okay.

16 We talked a fair bit about what was going on in the Outer Oval, the dining room,

17 the Rose Garden that afternoon. At any point during that time, was your husband in any

18 of those locations in the West Wing?

19 A No. I recall he was in the EOB and stayed there until we left.

20 Q Okay. And did you speak with him during the day to -- and, if so, did you

21 share with him what was going on in the vicinity where you were in the West Wing?

22 A Not that I recall.

23 Q Okay.

24 Before January 6th, did you have an expectation about how the transition would

25 work, leaving the administration, leaving the White House?

1           A    Generally or personally?

2           Q    Both. Let's talk generally first. Were you aware of transition activities  
3   before January 6th?

4           A    I don't recall being aware of -- I wasn't involved in those discussions that I  
5   recall prior to January 6th.

6           Q    Okay. How about you personally? What were your thoughts about what,  
7   you know, plans you needed to make and changes that would be coming for you  
8   personally?

9           A    I had made a plan to move to Florida.

10          Q    And about when did you start making arrangements to move to Florida?

11          A    Sometime after the election.

12          Q    Okay. Can you give us a general sense, was it in November or December?

13          A    Sometime probably in November.

14          Q    Okay. And is that because you at that point understood that you would  
15   continue working for President Trump even after he left office?

16          A    Yes.

17          Q    Okay. And when did that plan form, or when did your expectation -- when  
18   did you get the expectation that you would continue to be employed by President  
19   Trump?

20          A    Sometime immediately following the election.

21          Q    And who hired you or who gave you that impression, that you would  
22   continue on in employment?

23          A    The President.

24          Q    Okay. Can you tell us about that? Was there a specific conversation in  
25   which he conveyed that to you?

1           A    He asked me verbally if that's something I'd be interested in.

2           Q    And how did you respond?

3           A    I got back to him in the following days.

4           Q    So you said his initial conversation was verbal to you. Did that take place in  
5       your office?

6           A    Yes, it took place in the Outer Oval.

7           Q    In the Outer Oval. Was there anyone else there when you had that  
8       conversation with the President?

9           A    I recall Austin being there.

10          Q    Okay. And any sort of things that stick out in your mind to remind yourself  
11       of when that might've taken place?

12          A    I recall having had made significant plans to move even in December, you  
13       know, packing boxes and relocating. I don't remember the exact time I had made a  
14       decision.

15          Q    Okay.

16          And you told us that you got back to the President a day or so, I think you said,  
17       after he asked you if you'd be interested in working for him in Florida. Was that also a  
18       verbal, face-to-face communication? Or how did you communicate that to the  
19       President?

20          A    That was a face-to-face.

21          Q    Okay. And was there anyone else there when you had that -- you know,  
22       your response to him?

23          A    Not that I recall.

24          Q    Okay. Did you have to travel to Florida to, you know, find a new place to  
25       live, get a lease, look for a house, anything like that?

1           A    I did that in January.

2           Q    In January. Okay. About when in January?

3           A    Sometime before the 20th.

4           Q    Got it.

5           And at the end of the year here in D.C., did you have to -- I know you mentioned  
6    that you had been packing boxes. Were there any other specific arrangements that you  
7    needed to make, like giving notice on a lease or -- I don't know if you, you know, put a  
8    house up for sale. Anything like that?

9           A    I put the condo I was living in for sale later in the year 2021.

10          Q    Got it. Okay.

11          [REDACTED] Anything?

12          [REDACTED] Yeah.

13          BY [REDACTED]

14          Q    Just a couple more things on that, Ms. Michael.

15          Like, when you had this conversation with the President which you think was  
16    sometime perhaps in November, did he say anything about his disappointment about the  
17    election or the administration ending?

18          A    Not that I recall.

19          Q    Just tell us a little bit more how this came up. Did he just say, "Hey, do you  
20    need a new job when this is all over?" Like, what, to the best of your recollection -- how  
21    did the conversation start, and how did it progress?

22          A    I recall it being a short conversation. He indicated he'd like me to think  
23    about if I would move to Florida.

24          Q    Was it your impression at that time that the administration was ending, that  
25    this was something -- everybody was looking for a job?

1           A     In the days and weeks and months following the election, people began  
2 seeking other opportunities.

3           Q     I understand, but I'm just wondering if the President said anything like that,  
4 that the President said "given that the administration is ending," "given that you need a  
5 new job." Was there any acknowledgement of the loss during that conversation?

6           A     Not that I recall.

7           Q     Did he ever at any point talk to you about staying on for a second term, that  
8 you should stay and -- because there's going to be a second term?

9           A     This is the only conversation I can recall speaking about my personal future.

10          Q     Okay. Do you know if he had conversations like that with others about  
11 their personal futures upon the completion of the administration? Did anybody else  
12 mention that to you?

13          A     Not that I recall.

14          Q     Did you share that with others, the fact that the President asked you to stay  
15 on with him after the administration was over?

16          A     I recall sharing that with my family.

17          Q     I'm talking about other people in the White House, besides your family.

18          A     I don't recall having -- I don't recall relaying this conversation to anyone in  
19 the White House.

20          Q     Okay.

21          When the President asked you this, was it your impression, Ms. Michael, that he  
22 knew that it was ending, that everybody was going to be out of a job as of  
23 January the 20th?

24          A     I don't recall forming an impression.

25          Q     Did he ever say anything to you or anybody else, again, about staying on

1 after January 20th that you ever heard?

2 A I don't recall that.

3 Q Okay.

4 Best as you can tell, how long after the election did this take place, this  
5 conversation where he asked you to stay on with him in Florida?

6 A Sometime in November.

7 Q Again, like, about how long after the election? Was it the next day? A  
8 week or so later? A month or so later? Do you have any better recollection as to  
9 about how long after the election it was?

10 A It's a very blurry time for me.

11 Q Was it before or after Thanksgiving?

12 A I don't recall the conversation in relation to Thanksgiving.

13 Q Okay. Do you remember when you talked to your family about it? Did  
14 you see them over Thanksgiving?

15 A I don't recall where I spent Thanksgiving that year. I don't recall when I  
16 told my family.

17 Q The networks and, sort of, the -- the election was called for President Biden  
18 on Saturday, November 7th, I believe. Was this after that or potentially in the days  
19 before that, that you had this conversation with him?

20 A I don't specifically recall if it was before or after that.

21 Q Did he ever say anything about President-elect Biden to you, like "I can't  
22 believe I lost to this guy" or anything like that, anything positive or negative about the  
23 President-elect at any time?

24 A I don't recall.

25 Q Not just saying it to you, but saying it out loud that you heard?

1           A    I don't recall.

2           Q    You don't remember him ever mentioning President Biden's name?

3           A    I don't recall any specific conversations about that.

4           Q    All right.

5                 And how many other people from the White House staff did go on to Florida to  
6                 work with him, your current colleagues or otherwise associated with the former  
7                 President?

8           A    A small handful.

9           Q    Who else was on that list besides you, Ms. Michael?

10          A    Someone that works for the First Lady, Hayley D'Antuono.

11          Q    Okay. She was in the White House and now works in Florida for the First  
12         Lady, correct?

13          A    Yes.

14          Q    Okay. Who else?

15          A    Someone that worked in operations named Beau Harrison.

16          Q    Okay. Mr. Harrison works for -- he's actually engaged to Ms. D'Antuono,  
17         right?

18          A    That's correct.

19          Q    Okay. And what's his role currently down in Florida?

20          A    He continues in an operations role.

21          Q    Okay. Are they all, like you, employed by the Save America PAC?

22          A    Yes.

23          Q    Okay.

24          I keep interrupting you. I'm sorry. Who else is on that list of White House  
25         employees who have gone on to work in Florida for the PAC?

1           A    Let's see. Someone that worked for Mark Meadows as his scheduler. Her  
2       name is Eliza.

3           Q    Okay. Eliza what?

4           A    Her last name is Thurston.

5           Q    Okay, Eliza Thurston. And what's her role for the PAC?

6           A    She continues in a scheduling function.

7           Q    Okay. Anyone else?

8           A    There are a few others. Someone named Margo Martin.

9           Q    Okay. What was Ms. Martin's role at the White House, and what does she  
10      do now at the PAC?

11          A    She works in -- she worked in the press office, and she continues to work in  
12      press.

13          Q    Okay. Anyone else?

14          A    That's all that I can recall right now.

15          Q    All right. And did you talk to any of them about your, sort of, common plan  
16      to move to Florida while you were all still working in the White House?

17          A    Towards the latter days of the administration, there were certain meetings  
18      with the operations team at the White House that was aware of how a transition works,  
19      in terms of the GSA's involvement.

20          Q    Okay. I'm not really following you. I'm wondering whether you had  
21      personal conversations with the others that, like you, were moving from the White House  
22      to Florida. Was that in the context of these discussions with GSA?

23          A    I attended basic informational meetings about what a transition is through  
24      the GSA with some of these individuals.

25          Q    Okay. Did you talk to any of them before those meetings about the fact

1 that you were going to be working for the Save America PAC in Florida, "Hey, you are too,  
2 what are your plans," you know, compare notes, that sort of thing, like, sort of making a  
3 connection that you were going to be colleagues in this new role in Florida?

4 A Those connections we made after the 20th.

5 Q Have you since heard from any of them as to when they had conversations  
6 with the President about the offer like you received, to move to Florida? Any of them  
7 share with you their process?

8 A I'm not aware of that.

9 Q Do you know if he made the same offer to Beau Harrison or Hayley  
10 D'Antuono or Eliza Thurston or any of them about, "Hey, come work for the PAC in  
11 Florida"?

12 A I'm not aware of that.

13 Q Have you had any conversations at any time about that, sort of comparing  
14 notes about the circumstances of your transition from the White House to the PAC?

15 A I don't recall.

16 Q Okay.

17 I think ██████████ has some more questions about the PAC, so I'll leave it back to  
18 her.

19 Great. Thank you. Yeah, just a few.

20 BY

21 Q So, just to be clear, very early on today, you told us that your title is still  
22 "executive assistant" at the PAC. Is that correct?

23 A I don't believe I have a formal title like that listed. I consider myself an  
24 assistant.

## 25 Q Assistant to the President?

1           A    An administrative assistant, and I do work with the President.

2           Q    Okay. Are there -- sorry, didn't mean to interrupt you.

3           A    That's okay.

4           Q    Are there others that you support in that administrative assistant role in  
5 addition to the former President?

6           A    I am paid by Save America, and that organization has a head, which is Susie  
7 Wiles, and I coordinate and work with her in an assistant-type role.

8           Q    Okay.

9           Are you aware of the Save America PAC providing financial assistance to people  
10 who have received subpoenas or are providing testimony to the select committee?

11          A    I'm not aware of that.

12          Q    Okay. Are you receiving financial assistance in connection with your  
13 representation of your lawyer or other expenses connected with your testimony that  
14 you're giving today?

15          A    No.

16          Q    Okay.

17          I remember at the beginning of our day today you said that when you received  
18 your subpoena you reached out to Mr. Herschmann about retaining counsel. Is that  
19 right?

20          A    That's correct.

21          Q    Okay. And then you don't have to tell us any of your communications with  
22 your counsel, but is there anyone else that you talked to about your retention of counsel  
23 to represent you here before the select committee?

24          A    Not that I recall.

25          Q    Okay.

1 Any understanding about how the fees for your counsel would be paid?

2 A I understand I'm being represented pro bono.

3 Q Pro bono. Okay. And who gave you that impression?

4 A My attorney.

5 Q Okay. Did you have any communications with Ms. Wiles about that?

6 A Not that I recall.

7 Q Okay. So no communications with the head of the PAC about the provision  
8 of pro bono counsel to represent you here today?

9 A Not that I recall.

10 Q Okay. Is the provision of pro bono counsel contingent on anything here?

11 A Not that I'm aware.

12 Q In the context of retaining counsel, did you have any communications with  
13 anyone about the substance of your knowledge or the content of your testimony?

14 A Not that I recall.

15 Q Okay.

16 BY [REDACTED]

17 Q Ms. Michael, we've just been told by other witnesses that they should call  
18 Ms. Wiles if there is an interest in -- a need for financial assistance to pay lawyers to  
19 represent them in negotiations or discussions with the select committee.

20 Have you ever heard of anything like that, Ms. Wiles being a conduit of such, a  
21 legal-defense-fund-type assistance?

22 A I'm not aware of those discussions.

23 Q Have you ever taken any calls or facilitated any calls for her with witnesses  
24 who have been interested in any such financial assistance because of a subpoena from  
25 the select committee?

1           A    I don't facilitate phone calls for her that I recall.

2           Q    Okay. Have you ever talked with her about that, about a legal defense fund  
3    or any money available to help people hire lawyers because of these subpoenas?

4           A    I wouldn't have any reason to.

5           Q    So I guess the answer is, no, you haven't talked to her about that and heard  
6    anything from her about that?

7           A    I don't recall.

8           Q    Has anyone else who's been a witness before the select committee talked to  
9    you about getting financial assistance from any source, specifically with respect to legal  
10   fees?

11          A    Not that I recall.

12          Q    "I'm getting help from this person or this organization." Have you heard  
13   anything like that from anyone with respect to legal fees and the select committee?

14          A    Not that I recall.

15          Q    Okay.

16          [REDACTED]    Okay. Is that it?

17          Okay. That's all we have today. So, unless there's anything you'd like to  
18   address, Mr. Benson, I think we can go off the record.

19          Mr. Benson. Okay. Just one thing, one quick thing. We have a letter of  
20   instruction from President Trump that I'd like to put on the -- you know, just include on  
21   the record, if that's okay.

22          [REDACTED]    Yeah, from President Trump? I know you've provided to us in  
23   advance -- or we received in advance, rather, a letter from the current White House. If  
24   there's another letter, we're happy for you to provide that to us, and we can add it as an  
25   exhibit.

1           Mr. Benson. Okay. So can I just email it to you?

2           ██████████ We can. I'm not -- do you want to give us a sense of what the  
3       contents are?

4           Mr. Benson. It's just a letter essentially saying he's not invoking  
5       the executive -- he is -- he is invoking executive privilege.

6           ██████████ Okay. We've not heard any objections to our questions here today  
7       on the basis of executive privilege. This is --

8           Mr. Benson. Right. I just want -- just so that it's complete, you know, on the  
9       record somewhere. I just -- I have not made any objections on that basis.

10          ██████████ Yep.

11          ██████████ Okay.

12          ██████████ Yeah, that's fine, Mr. Benson. We appreciate that. We'll make  
13       sure that's a part of the record.

14          And then the only thing is, we need to make sure we keep this record open. We  
15       don't have any intention to call Ms. Michael back, but, to the extent we get documents  
16       from the Archives or other sources that require that -- we'll try to avoid it, but, for that  
17       reason, we have to keep the deposition open until we get access to that information.

18          ██████████ And I think maybe just to clarify, we haven't heard any objections  
19       today to the questions on the basis of executive privilege, and Ms. Michael has  
20       responded, from our perspective, to each of the questions.

21          Is the President's instruction of invoking executive privilege -- has that in any way  
22       limited the responses that the witness has given to our questions?

23          Mr. Benson. Not -- not to my knowledge.

24          ██████████ Okay.

25          ██████████ Yeah. Okay.

1           Mr. Benson. If we had an object- -- you know, if we were invoking -- if we were  
2 going to rely on that, I would've objected. So I'm just --

3 [REDACTED] Yeah.

4  Understood.

5 [REDACTED] Okay. We've got it. So, if you provide that, we'll add it as exhibit  
6 78 to the deposition.

[Michael Exhibit No. 78]

8 Was marked for identification.]

9 And, at this time, we will recess, subject to the call of the chair.

10 And we're off the record now.

11 [Whereupon, at 6:27 p.m., the deposition was recessed, subject to the call of the  
12 chair.]

2

3

4 I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the  
5 answers made by me to the questions therein recorded.

6

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10 Witness Name

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**Witness Name**

15

Date